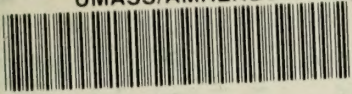


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FHWA-MA-EIS-82-02-F

Final Environmental Impact Statement and Final Section
4(f) Evaluation

Third Harbor Tunnel, Interstate 90/ Central Artery, Interstate 93



Boston, Massachusetts

Volume 2

Federal Highway Administration
Massachusetts Department of Public Works
August, 1985

FOREWORD

Written Comments and Responses on DEIS/DEIR, SDEIS/SDEIR, and Public Hearing is one of six separately bound volumes which constitute the Final Environmental Impact Statement/Environmental Impact Report package for the Third Harbor Tunnel/Central Artery Project, as listed below.

1. Final Environmental Impact Statement/Report
2. Written Comments and Responses on DEIS/DEIR, SDEIS/SDEIR, and Public Hearing
3. Public Hearing: Synopsis of Testimony, Responses to Verbal Comments, Transcript
4. Supportive Engineering Report
5. Appendices
6. Two-Lane Tunnel/Optional Fort Point Channel Concepts

Materials are organized as follows:

Comments and Responses on the DEIS/DEIR; Comments and Responses on the SDEIS/SDEIR; and Public Hearing Written Testimony and Responses.

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COLLECTION
APR 27 1987
University of Massachusetts
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WRITTEN COMMENTS AND RESPONSES
ON DEIS/DEIR

Memorandum



U.S. Department of Transportation
Office of the Secretary
of Transportation

Subject: Draft EIS Third Harbor Tunnel, -00
Boston, Massachusetts
File#-MA-EIS-82-02-0

Date: MAR 22 1983

From: Joseph Canby, Deputy Director
for Environment and Policy Review, B-35

To: All R. Javlin, Director
Office of Environmental Policy, FHWA/NE-1

The following comments are in response to the Draft Environmental Impact Statement for the Third Harbor Tunnel in Boston.

All "Build" alternatives discussed in the EIS have major section 4(f) and section 106 impacts on the Fort Point Channel Historic District in the South Boston Harbor area. The project will not only negatively affect the historic district but also the area's character and other district values. The present visual attributes of the channel and harbor.

In light of these impacts, additional alternatives which would avoid or substantially reduce the infringement on the historic district must be considered and discussed in the EIS in order to meet the requirements of section 4(f) and section 106. It would appear from the draft EIS that at least three alternatives (possibly with variations) require consideration:

1: Tunnels parallel to the Dewey Square Tunnel. The draft EIS indicates that four alternatives involving this alignment were considered during corridor planning studies (CPS), but were eliminated from further consideration. Information must be presented in the EIS to show why any of these would not be a less disruptive or prudent alternative to the use of section 4(f) and a Fort Point Channel.

2: Transit options. These were also considered in the CPSs, but there is no information presented in the EIS as to why they are not feasible and prudent alternatives.

3: Alternatives located south of Fort Point Channel, or crossing only the south end of the harbor district with a south tunnel partly located somewhere between pier 4 and the Massport Marine Terminal.

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Of the build alternatives discussed, Alternative 4, Western Tunnel, along Central Artery improvements using the railroad alignment appears to best fulfill the purpose of the project to provide additional vehicular harbor crossing capacity in Boston to Logan International Airport. This is termed "avoid section 4(f) impacts on Memorial Stadium and Bird Island Flats Park and encroachment on North Park, all in East Boston. The second harbor crossing would have some adverse impact on the harbor as it would require the construction of a new bridge over the harbor, dredging and uses the existing railroad right-of-way in East Boston to connect the tunnel to existing highways into the airport.

Alternative 2 has the same advantages as Alternative 4 but the addition of the split tunnel connection back to the Central Artery north of Dewey Square. This is termed "avoid section 4(f) impacts on Memorial Stadium and Bird Island Flats Park and encroachment on North Park, all in East Boston. The second harbor crossing would have some adverse impact on the harbor as it would require the construction of a new bridge over the harbor, dredging and uses the existing railroad right-of-way in East Boston to connect the tunnel to existing highways into the airport.

Additional study is suggested also for all build alternatives on relocating the ventilation buildings to more unobtrusive places or appropriate joint uses in the channel area.

In view of the section 4(f) impacts and others identified in the DEIS as no mitigation, costs ranging from \$735 to \$945 million (1979 dollars) and opposition from East Boston neighborhoods and locally elected representatives, we recommend further examination. In more detail than shown in the DEIS, of an "avoid" alternative with extensive improvements proposed to the existing road and transit system. For example, we are concerned that all "Build" alternatives would require the construction of a new bridge over the harbor, dredging and uses the existing railroad right-of-way in East Boston to connect the tunnel to existing highways into the airport. This would require the construction of a new bridge over the harbor, dredging and uses the existing railroad right-of-way in East Boston to connect the tunnel to existing highways into the airport.

Because of the need for detailed consideration of additional alternatives, in order to meet section 4(f) requirements, it appears that a supplemental draft EIS will be required.

Since the project was first proposed, there has been considerable correspondence objecting to the proposed harbor tunnel. However, the DEIS appears to give little recognition to these community concerns by failing to discuss and respond sufficiently to the problems perceived by the neighborhoods with this project. Further discussion of community concerns such as controlling the construction of the tunnel, the impact of the tunnel on the harbor, and the impact of a technical advisor to citizens, etc. should be included in the suggested supplemental DEIS.

Thank you for the opportunity to review the Third Harbor Tunnel project.

RESPONSE TO COMMENTS BY THE U.S. DEPARTMENT OF TRANSPORTATION, OFFICE OF THE SECRETARY OF TRANSPORTATION (March 22, 1983)

1. The option of widening the existing Dewey Square Tunnel was evaluated in the Supplement to the Draft Environmental Impact Statement and Report (DEIS/DEIR) Section 2.5.1, pages 19-24; it was rejected based on the severity of its impacts on surrounding neighborhoods, most notably Chinatown, a potentially - eligible National Register district. These conclusions are also noted in the Final Section 4(f) Evaluation.

2. The CPS concluded that the demand for cross-harbor transportation could not be adequately served by transit improvements alone, although transit improvements could supplement the service provided by the highway connections in the area. The Preferred Alternative improves transit service between South Station and the Airport by virtue of exclusive bus ramps to/from the Third Harbor Tunnel (see Section 4.2.8).

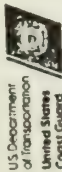
3. The Preferred Alternative minimizes impacts to the Fort Point Channel by following an alignment which crosses the southern end of the historic district to connect to a Seaport Access Alignment route, with a south portal between pier 5 at the drydock and the Boston Marine Industrial Park. See Section 2.2.1 Description of the Preferred Alternative, in the FEIS/FEIR. The northbound Central Artery tunnel in Fort Point Channel has been designed to minimize impacts on the Channel while serving the transportation needs of the project. Impacts of the project on the Channel are documented extensively in the FEIS/FEIR, Section 4.14 and 4.16, and Chapter 5.0.

4. Those alternatives which used the Conrail railroad right-of-way in East Boston were rejected due to the disruption of East Boston neighborhoods which such an alignment would entail. The Preferred Alternative has a shorter route across the Harbor and requires less dredging than did Alternative 4, without the adverse effects on East Boston residential areas.

5. Alternative 2 was rejected for the same reason as Alternative 4 -- potential for substantial disruption of East Boston neighborhoods. The objectives of the project have been expanded to include improvement to traffic flow on the Central Artery, as well as cross-harbor. This is reflected in the SDEIS/SDEIR and FEIS/FEIR, "Description and Purpose of the Proposed Action" (Section 4 of the SUMMARY of both documents).

6. The issue of locations and appropriate joint uses of ventilation buildings is addressed in Section 4.4 Joint Development and Section 4.7 AIR QUALITY in the FEIS/FEIR and will be further addressed during preliminary design when additional air quality modeling and urban design work will be performed. At the present time, the NO_x emissions from the ventilation buildings as analyzed for the Preferred Alternative in the Central Artery corridor do not conform with State air quality requirements. Final locations have yet to be determined.

7. The traffic impacts sections of the SDEIS/DEIR and FEIS/FEIR examined the volumes of traffic on local streets resulting from the alternatives (see section 4.2 in both documents). Further discussion of the projects effects on local streets is also summarized in Section 1.3 of the FEIS/FEIR. The requirements for citizen participation in the environmental process were followed as per federal regulation. Public Information Meetings, Working Committee Meetings, field offices in various project area neighborhoods, and two 12-hour Public Hearings were held (see Appendix 1, Public Participation Process). A technical advisor was also made available to the East Boston community during the preparation of the SDEIS/SDEIR and the FEIS/FEIR.



U.S. Department
of Transportation
United States
Coast Guard

Commander
410 Coast Guard District

130 Chambers Street
New York, New York 10038
Phone 617-422-0445 (687)

16591

5 APR 1983

Mr. Martin van Noy
Director
Federal Highway Administration
55 Broadway
Cambridge, MA 02142

Dear Mr. van Noy:

We have reviewed the Draft Environmental Impact Statement (DEIS) for the Third Harbor Tunnel Project, Boston, Massachusetts. The following comments are offered for your consideration.

All of the alignments considered are located along the westerly edge of Fort Point Channel, and all impact the historic bridges at Summer Street and Congress Street. The proposed relocation of Dorchester Avenue also affects these bridges.

On page 287 of the DEIS it is stated that alignments east and west of Fort Point Channel, alternatives which would avoid the historic structures, were considered and discarded in the Corridor Planning Study (CPS) because of unacceptable horizontal and vertical geometry, additional property takings and displacements, and costs.

Section II B of the CPS reveals that Study Alternatives 8 and 9 are Tunnel Alternatives. The report states that the tunnel alternatives would avoid the historic area. This Section states that alignments in South Boston, east of Fort Point Channel, were considered and that two emerged as feasible alternatives. The reader is referred to the Boston Transportation Planning Review (BTPR) report, "Harbor Crossing: Draft Environmental Impact Statement, Preliminary Location Report Package Report", dated September 1972.

The BTPR report discusses one corridor, an alignment through Reservoir Channel. A route through this corridor is not rejected in the report. The route would have no direct impact on any 4(f) properties. The area between Fort Point Channel and Reservoir Channel was not studied. A suitable alignment might be found in this area.

The proposed relocation of Dorchester Avenue into Fort Point Channel impacts the historic area. The report states that the relocation of the bridge would affect the historic area. The report also states that the relocation of the bridge would affect the historic area.

Any modification of the Summer Street, Congress Street or Reservoir Avenue bridges, and any temporary or permanent crossing of Fort Point Channel must be approved by the Coast Guard.

The no build and the four build alternatives for the Third Harbor Tunnel Project will have no long term adverse impact upon navigation and maritime commerce in Boston Harbor. However, in the short term, the build alternatives require dredging and the laying activities in the Special Anchorage Areas near Fort Point Channel and General Anchorage Area No. 1 near Jeffries Cove. Both recreational and to a much lesser extent, commercial vessels will be affected by construction. It is suggested that construction in the special anchorage areas be completed as soon as possible to minimize the impact on the harbor. This would significantly lessen the impact upon the hundreds of recreational boats that utilize these anchorage areas in the late spring and summer months. Since General Anchorage Area No. 1 is seldom used by commercial or recreational vessels, I do not foresee any scheduling conflicts.

On page 21 it is mentioned that due to precision and safety required in placing tunnel sections, the DEIS is not intended to be a final design. The DEIS is a conceptual study. Close coordination with the Coast Guard Captain of the Port Station MA (221-4707) is paramount in this regard. Advance warning of such restrictions to vessel traffic is critical. Traditionally, at least 3-4 weeks lead time is often needed to allow the maritime interest to reschedule into arrivals and departures around the restrictions imposed by the Coast Guard. Commercial vessel activity in Boston Harbor is also, for the most part, seasonal with numerous petroleum products moved in the winter months. This further demonstrates the need for close coordination with the Coast Guard Captain of the Port.

The DEIS is too narrow in its scope in that only tunnel alignments on the west side of Fort Point Channel are discussed. The Corridor Planning Study, included in the DEIS for reference, contains alignments which would not impact the 4(f) properties in Fort Point Channel. However, these alignments are not mentioned. Other possible alignments in South Boston also are excluded. These alignments would avoid the historic area and would not impact the historic area. There is no feasible and present alternative to a proposal which impacts historic sites.

Sincerely,

C. E. Robinson

Rear Admiral, U. S. Coast Guard
C. E. ROBINSON
Acting Commander, First Coast Guard District

RESPONSE TO COMMENTS BY THE UNITED STATES COAST GUARD (April 5, 1983)

8. See response to comment number 3. Impacts on the historic Fort Point Channel have been fully evaluated, including alternatives to avoid the Channel, in the FEIS/FEIR. The Preferred Alternative minimizes impacts to these bridges due to alignment modifications made to the northbound Central Artery tunnel and to relocated Dorchester Avenue. A Memorandum of Agreement in accordance with Section 106 of the National Historic Preservation Act has been executed and is included in the COMMENTS AND COORDINATION section of the FEIS/FEIR.

9. As noted in the SUMMARY, Section G, of the FEIS/FEIR, modifications to existing bridges over water bodies will require a U.S. Coast Guard permit.

10. The Preferred Alternative avoids construction in the Special Anchorage Areas near Fort Point Channel, and in the General Anchorage Area No. 1 near Jeffries Cove.

11. The FEIS/FEIR acknowledges the necessary close coordination with the Coast Guard and other maritime interests during the construction of the cross-harbor tunnel.

12. See response to comment numbers 1 and 3: See Chapter 5.0, SECTION 4(f) EVALUATION in the FEIS/FEIR for further discussion of possible alignments to avoid the Fort Point Channel.



U.S. Department of
Transportation
Office of the Secretary
of Transportation

Regional Memorandum
to the Secretary

Project: 1
Title: 1
Numbered: 1
Date: 1

17 March 1983

Mr. Justin L. Radio, P.E.
Chief Engineer
Massachusetts Department of Public Works
100 State Street
Boston, Massachusetts 02114

Dear Mr. Radio:

The following comments pertain to the DEIS for the Third Harbor Tunnel Project (FHWA-EIS-82-001-B) from the Department of Transportation. I contacted the Urban Mass Transportation, Federal Railroad, and Federal Aviation Administrations as well as the United States Coast Guard for their comments. The Urban Mass Transportation and Federal Railroad Administrations have no comments regarding the project. The Coast Guard indicated that they would mail their comments. The following comments are from the Federal Aviation Administration.

A review of the elevations for the proposed ventilation structures indicate that none of the proposed tunnel alignments will cause obstructions to air navigation. However, at the final design stage, a detailed construction information will be required. The sponsor shall provide specific information on FAA form 7460-1.

There must be more concern expressed for the impacts on traffic to Boston's Logan Airport both during the construction stage as well for the long term. Mitigating measures must be incorporated in the final design. On the other hand, the proposed ventilation structures and the proposed island flats will be constructed with Federal grant-in-aid assistance and thus should be listed as a proposed Federal project under Summary Item 8.

We appreciate the opportunity to comment on this EIS draft.

Sincerely,

George J. Bond, II
George J. Bond, II
Lieutenant Commander
U.S. Coast Guard
Senior Staff Officer

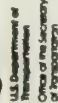
Copy to: Norman Vanless
Federal Highway Administration

RESPONSE TO REGIONAL REPRESENTATIVE OF THE SECRETARY, U.S. DEPARTMENT OF TRANSPORTATION (March 17, 1983)

13. The PHWA and MDPW are aware of the potential for encroachment into the navigable air space by the proposed ventilation building in the vicinity of Logan Airport at Bird Island Flats. The Federal Aviation Administration will be furnished with the specific information required on FAA Form 7460-1 during the design phase of the Preferred Alternative.

14. The proposed project is intended, among other things, to improve accessibility to Logan Airport for passengers and cargo. Short-term effects of the project during construction are addressed in greater detail in the PRIS/FEIR. Staging assumptions, particularly for the Logan Airport roadway construction activities, are presented in Section 4.1 DESCRIPTION OF CONSTRUCTION. These assumptions, and the resulting impacts on traffic flow and Airport access, are discussed in Sections 4.2 TRANSPORTATION and 4.3 LAND USE. In short, traffic management techniques will be implemented, including temporary pavement and traffic controls as necessary, to maintain access to the Airport during construction. Mitigating measures identified in the PRIS/FEIR will be incorporated into the project design.

15. The SUMMARY, Item 8, has been amended in the PRIS/FEIR to include the Bird Island Flats access roadway system as another federal action in the area.



Dear Mr. Radlo:

I had provided the Department of Transportation's comments to the Dept. of Environmental Protection on 17 March. In that letter, I stated that the (FHA-M-ETS-82-02-B) on 17 March. In that letter, I stated that the Federal Railroad Administration had no comments. That statement was in error, and I am providing, at this time, the comments of the FRA. These comments are in addition to the comments of 17 March and of the United States Coast Guard.

The FRA review indicates that the proposed Third Harbor Tunnel Project poses problems to the intercity rail facilities in the Fort Point Channel area. The following specific concerns are expressed:

1. Alternatives 4 and 5 should be eliminated from consideration as they present severe impacts. These alternatives indicate that four or five barge would pass beneath the Fort Point Channel Bridge. This bridge is in a seriously deteriorated condition, aggravated by pier settlement, and the passage of barges would further damage and threaten its integrity. All of Astoria's intercity rail traffic traverses this bridge and will continue to do so until the MFTA Southwest Corridor Project is completed in 1986. Even after completion, Amtrak service will continue to use the bridge. The proposed MFTA Southwest Corridor facility being built under the Northwest Corridor Improvement Project.
2. The DREIS ignores the existence of Astoria Inter-city Rail Station. This station will be affected as much as the MFTA Connector rail service. The DREIS does not mention the MFTA Connector, the MFTA Inter-city Rail Station, or the Fort Point Channel Bridge.

5. On page 245, "Utilities", the DBIS ignores any potential impact on railroad signal cable installations throughout the Fort Point Channel Bridge. There could be significant problems if construction were to disturb or sever these cables.

[illegible]

25 April 1983

2

I trust that these comments are submitted in sufficient time for adequate consideration in this project. It is hoped that these comments will be useful in the final evaluation of the DEIS.

Abstract

George D. Bond, II
Lieutenant Commander
U.S. Coast Guard
Senior Staff Officer

Copy to: Norman VanNess - FHMA-MA ✓
Marilyn Klein - FRA (RRP-32)
Alexander F. Ness Coast Guard District (dcl)

RESPONSE TO COMMENTS BY THE U.S. DEPARTMENT OF TRANSPORTATION, FEDERAL
RAILROAD ADMINISTRATION (April 25, 1983)

16. Extensive coordination with the Massachusetts Bay Transportation Authority with respect to railroad operations at South Station identified the need for provisions to maintain rail services during construction. In Section 4.1 DESCRIPTION OF CONSTRUCTION, scoping assumptions require that five tracks into South Station and two tracks across the Fort Point Channel be provided at all times by use of temporary track beds. This is the same number of tracks as exists today. A temporary facility over the Fort Point Channel will be provided to maintain service when the existing railroad bridge is removed. In the South Bay area, approximately \$80 million is included in the construction estimate of the Preferred Alternative for miscellaneous items, primarily traffic/railroad maintenance.

17. As noted above, replacement of the existing railroad bridge and temporary tracks is included with the Preferred Alternative to maintain intercity rail service. Extensive coordination will occur to assure no disruption to these services. The Fort Point Channel bridge is discussed in Section 4.1 DESCRIPTION OF CONSTRUCTION.

18. The FEIS/FEIR includes a statement in Section 4.15 UTILITIES, noting relocation requirements of railroad signal and communications cable crossing the Fort Point Channel. The project's potential effects on Atrak and MBTA rail services have not been overlooked in the development of the Preferred Alternative.

DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
WALTON, MASSACHUSETTS 02224

March 21, 1983

MEMORANDUM FOR
VFP00-7-20

SUBJECT: Third Harbor Tunnel Project, Interstate 90
Final Environmental Impact Statement/Report

Mr. Norman J. Van Ness
Division Administrator
Federal Highway Administration
Transportation Systems Center
1215 Massachusetts Avenue, N.E.
Cambridge, Massachusetts 02142

Dear Mr. Van Ness:

In response to the Draft Environmental Impact Statement/Report (DEIS/EIR) for this project, the following comments are being submitted on behalf of the U.S. Army Corps of Engineers. These comments address those issues and areas of jurisdiction within the purview of our regulatory permit program.

The no-build alternative and four build alternatives for the Third Harbor Tunnel Project are considered to extend Interstate 90 from the Massachusetts Turnpike/General Airport area in East Boston, Massachusetts, to the International Airport area in East Boston, Massachusetts. All build alternatives involve tunnel construction within the Port Water Channel.

Following a staff review of the DEIS/EIR, it was determined that various aspects of the project are inadequately addressed and that further attention is warranted in the final Environmental Impact Statement/Report. Compliance with the substantive requirements of the Corps' regulation, namely, i.e., Section 10 of the River and Harbor Act, Section 404 of the Clean Water Act and Section 102 of the Marine Protection, Research and Sanctuaries Act. The following comments are not intended as an evaluation of the project, but as an assessment of the DEIS/EIR adequacy for regulatory purposes:

A. Permits

1. Permitting authority for this project is restricted to Section 10, 102 and 404 activities such as dredging, tunnel construction, bulkheading and other activities. The permit requirements for the Lynn Harbor fabrication site activity area do not include Sections 9 and 11 of the River and Harbor Act as stated.

2. At this time, it is difficult to determine which associated activities will require a Corps permit. However, such activities as relocation of existing sewer outfalls and cooling water intake structures, as well as temporary construction activities, require coordination from the Department of the Army. We will review a site-specific permit application for these activities. It is essential for us to understand the entire scope of the project.

B. Provisions

1. The DEIS/EIR did not address the associated environmental impacts at the proposed dredged and disposal sites. The impacts should be included in the draft EIS/EIR. At one point, the DEIS/EIR states that dredging activity will be performed by clamshell, whereas the Supportive Engineering Report indicates that hydraulic methods would be used.
2. The DEIS/EIR did not adequately consider alternative disposal sites for dredged material. Alternative disposal sites should be considered in the Environmental Impact Statement/Report for Boston Harbor, relative to the proposed disposal sites. You should be aware that this study has not been finalized and approved.
3. The DEIS/EIR should include a discussion on disposal management techniques, showing the rate contaminated sediments with the suspended clay material.
4. Although stated, we are unsure of any dredging operation or seasonal restriction for Boston Harbor. Our records indicate that dredging activity has been performed throughout Boston Harbor during the estimated February 1 to May 15 time period for the past several years.
5. We are unsure of any notification from the Environmental Protection Agency (EPA) as to the validity of test results contained in their 1979 bioassay/bioaccumulation study for Boston Harbor. Therefore, EPA should be consulted for verification, should the study be included for consideration of expected non-environmental effects to the environment from dredged material.
6. The DEIS/EIR does not include sufficient information regarding the proposed dredging activity in Lynn Harbor to facilitate construction of the dry dock fabrication site. Prior to construction and removal of open water disposal of approximately a million cubic yards of dredged material, physical, chemical and/or biological testing would be required.

C. Dredging Impacts

Port Water Channel

1. Additional consideration is warranted since construction of any of the proposed alternatives would be detrimental for future marine oriented activity in the Port Water Channel area.

Boston Harbor

1. The proposed tunnel alternatives have two potential navigation impacts on the harbor. The first is the potential for the construction of the tunnel to require the removal of existing shoaling material from the harbor. The second is the potential for the construction of the tunnel to require the removal of existing shoaling material from the harbor. The first is the potential for the construction of the tunnel to require the removal of existing shoaling material from the harbor. The second is the potential for the construction of the tunnel to require the removal of existing shoaling material from the harbor.

2. The second issue relates to impacts of construction activities within the Federal project area. It is quite conceivable that dredging, tunnel installation and backfilling operations would create shoaling and possibly additional navigation hazards within Federal channel limits. Construction areas, 100 feet wide easement and anchoring areas must be shown on construction plans. Construction areas must be shown on construction plans. Construction areas must be shown on construction plans.

3. In connection with the possibility of encountering ledge along the proposed tunnel alignment, ledge is frequently encountered in Boston Harbor and its occurrence should be considered.

Lynn Harbor

1. Sweeping requirements stated for Boston Harbor similarly apply to any projected areas within the Lynn Harbor Federal project. In addition, the projected use of the harbor as a staging area is likely to severely disrupt existing shoaling patterns during construction of the dry dock facility and segment fabrication. The contractor would be required to perform a reconnaissance survey of the area, a post dry dock condition survey of the area, and a post dry dock condition survey of the area, and a post dry dock condition survey of the area.

D. Tunnel Construction

1. Although the EIC/EN identifies concrete as the preferred alternative, the document also identifies steel as an alternative. Therefore, the installation of steel or concrete tunnel tube sections. Therefore, the installation of steel or concrete tunnel tube sections.

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document should include a detailed alternative analysis demonstrating why concrete has been selected as the preferred alternative.

E. Lynn Harbor Construction Site

1. The EIC/EN appears to have identified Lynn Harbor as the preferred site to construct the concrete tunnel tube sections. However, further discussions warranted relative to alternative locations and details for fabrication of the concrete and/or steel tunnel sections. An alternative analysis should include impacts to navigation, socio-economics, special interest groups, and the environment. The analysis should also include a cost-benefit analysis and a risk assessment. The analysis should also include a cost-benefit analysis and a risk assessment.

2. Should Lynn Harbor remain as the preferred alternative, the final document should include detailed plans and specific information relative to the construction of the tunnel. The document should include detailed plans and specific information relative to the construction of the tunnel. The document should include detailed plans and specific information relative to the construction of the tunnel.

3. Furthermore, there appears to be some omission as to the long-term use of the dry dock. The EIC/EN states that the dry dock area would be restored. The document later addresses the development of a multi-use marine facility and proposed 30 foot deep mooring area.

In order to insure that the final document contain sufficient information regarding the construction of the tunnel, the EIC/EN should provide a coordination meeting between the State and Federal representatives responsible for the preparation of the draft supplement and final EIC/EN. In light of the above, it appears that considerable information is required to adequately address alternatives and environmental impacts regarding several major issues.

Furthermore, additional comments may be forthcoming from our Maritime Division regarding the project as it relates to the proposed navigation improvement project for Boston Harbor as well as the National Environmental Policy Act. Therefore, the U.S. Army Corps of Engineers, New England Division, is requesting an extension of the comment period until April 15, 1993.

Should you have any questions concerning these comments or desire a copy of this letter, please contact Mr. Jeffrey A. Briggs at (617) 672-6191.

Sincerely,

V.L. Andreolas
Chief, Operations Division

Copy Furnished:

Massachusetts Department of Public Works
Attn: Mr. Martin L. Radio, Chief Engineer
100 Nathan Street, Room 520
Boston, Massachusetts 02114

RESPONSE TO COMMENTS BY THE U.S. ARMY CORPS OF ENGINEERS, NEW ENGLAND DIVISION
(March 21, 1983)

19. The FEIS/FEIR has been corrected to reflect the permit requirements for the project. FHWA/MDPW will continue coordination with the COE during the design phase.
20. Only clamshell dredging is proposed for this project. The reference to hydraulic dredging in the Supportive Engineering Report has been revised. Also, reasons for rejecting this method of dredging are discussed briefly in the FEIS/FEIR Section 4.1. DESCRIPTION OF CONSTRUCTION.
21. The FEIS/FEIR has been expanded to include additional evaluations of the possible beneficial uses of dredged materials, and alternative disposal sites (see Section 4.13 DREDGED AND EXCAVATED MATERIAL DISPOSAL).
22. Section 4.13 also discusses briefly disposal management techniques, including the potential for capping of the more contaminated sediments with the subsurface clay materials. As the COE is aware, however, recent attempts to cap contaminated materials at the Foul Site were not successful.
23. In the Order of Conditions by the Boston Conservation Commission for the filling of the South Boston Naval Base finger piers, Massport was restricted from dredging any amount of sediments during the period of February 1 to May 15th. It was assumed that this restriction would be uniformly applied to all dredging projects, and would therefore be applied to the Third Harbor Tunnel project. In view of COE's comment, this matter will be resolved during the permitting process.
24. Reference in Appendix 7 of the Draft Environmental Impact Statement and Report (DEIS/FEIR) to EPA's 1980 tests of Boston Harbor was only for comparison purposes to the results of tests conducted for the Third Harbor Tunnel study; corroboration of results is unnecessary.
25. As discussed in the FEIS/FEIR and in responses to comments by EPA (No. 38) and others, the tunnel materials have not been selected at this time. Both steel and concrete tunnel tubes are being considered. If the project proceeds and a decision is made on the tunnel material, FHWA and MDPW are committed to performing additional environmental documentation on any impacts of the fabrication site.
26. The project has been located along the westerly side of the Channel to avoid the former federal channel along the easterly side of the Fort Point Channel. While it is true that construction of the proposed project within the Fort Point Channel could affect the potential for future marine oriented activity in the Channel area, refinements to the alignments as presented in the FEIS/FEIR have been made for the Preferred Alternative to minimize encroachment of the project within the Channel. With the urban design measures included in the Section 106 Memorandum of Agreement, the Channel's use by pleasure craft may actually be improved by the Preferred Alternative.
27. The illustrations in the Supportive Engineering Report were not accurate in their depiction of the tunnel sections across the harbor. It has been stated that 600 feet of channel will be available to shipping during construction. The design will be developed with this requirement. Furthermore, there will be extensive coordination with the U.S. Coast Guard and the Boston Pilots Association during the design and subsequent construction phases to permit navigation to continue.

28. Sweep surveys will be conducted before a channel or anchorage area is to be reopened. The surveys will be submitted to COE for review.
29. While bedrock is found in many areas of Boston Harbor, the alignments for all alternatives, except the Preferred Alternative, are in locations where bedrock is at greater depth. Soil profiles contained in the Supportive Engineering Report for the DEIS/FEIR and the DEIS/FEIR do not suggest bedrock will be found along those alignments. Bedrock will definitely be encountered in South Boston for the Preferred Alternative. The impacts associated with its removal are addressed in the FEIS/FEIR in Sections 4.8.2 Vibration, 4.9 WATER RESOURCES, and 4.13 DREDGED AND EXCAVATED MATERIAL DISPOSAL.
30. As stated previously, this site may not be considered further if the tunnel material to be selected in the future is steel rather than concrete. If this site is considered further for use as a fabrication area, COE requirements will be addressed.
31. As discussed subsequently with the COE, the tunnel material may be concrete or steel. The DEIS/FEIR and FEIS/FEIR clarify this situation. Existing drydocks in the area will also be considered during the design phase.
32. See response to comment number 31.
33. See response to comment number 31.
34. The development of the Lynn Harbor fabrication site as a multi-use marine facility in the future was a private proposal for the site. The SUMMARY section of the DEIS/FEIR referred to the land based area when suggesting the site would be restored to its original condition upon completion of the tunnel fabrication.



DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION CORPS OF ENGINEERS
325 TRAVEL ROAD
WALTHAM MASSACHUSETTS 02154

April 4, 1983

ATTENTION OF:
Planning Division
Impact Analysis Branch

Mr. Norman Van Ness
Division Administrator
Federal Highway Administration
Transportation Systems Center
35 Broadway, 12th floor
Cambridge, Massachusetts 02142

Dear Mr. Van Ness:

The following comments are offered in response to the "Life Environmental Impact Statement" (LEIS) for the "Harbor Tunnel Project and to follow up on the March 21, 1983, comments of Mr. L. L. Sullivan of the New England Division.

In reference to item 11, 2nd full paragraph, the 912 foot section that the tunnel profile would be at least 2 feet above a potential future 65-foot sea channel. A note for your information and engineering considerations that alternatives 2 and 4 are situated below the 200 foot line cannot be that low harbor channel dimension is likely restricted by the "low line" profile. As such, the dimension between the projected profiles for Alternatives 2 and 4 need not be deeper than the 200 foot line.

Also note, that in our continuing study of channel improvements for Boston Harbor, we will consider a 30 foot level option. This would be considered only for the lower portion of the harbor. Since this depth is precluded by the existing tunnels in the upper harbor. The likelihood, however, of implementing this depth is not foreseeable.

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Should you have any questions concerning these comments or desire additional information from my staff, please contact Mr. Robert Miller at 617-542-5211. Please advise me of the date you wish the Division's review of the Draft LEIS/EB. Thank you for the opportunity to review this Impact Statement.

Sincerely,

Joseph L. Imaizumi
Chief, Planning Division

Copy Furnished:
Massachusetts Dept. of Public Works
Chief Engineer
Chief Engineer
100 South Street, Room 510
Boston, Massachusetts 02114

RESPONSE TO COMMENTS BY THE U.S. ARMY CORPS OF ENGINEERS, NEW ENGLAND DIVISION
(Planning Division, Impact Analysis Branch) (April 6, 1983)

35. Alternatives 2 and 4 have been rejected from further consideration. The profiles of the cross harbor tunnel of the Preferred Alternative have been developed to permit future channel deepening to 45 feet. If necessary, the profiles could be revised to accommodate a 50-foot depth; dredging and disposal requirements would, however, be increased. This requirement must be resolved during the design phase.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

400 SUMMIT STREET, BOSTON, MASSACHUSETTS 02202

March 17, 1983

Mr. Norman J. Van Ness
Division Administrator
U.S. Department of Transportation
Federal Highway Administration
Transportation Systems Center
55 Broadway, 10th Floor
Cambridge, Massachusetts 02142

RE: D-PH-840050-MA

Dear Mr. Van Ness:

We have completed our review of the Draft Environmental Impact Statement (EIS)/Report, Third Harbor Tunnel Project, Interstate 90, Boston, Massachusetts.

As a member of the Interagency Committee for the Third Harbor Tunnel, we appreciate the extensive coordination that took place during the development of the Draft EIS. In general, we believe that the Final EIS needs to further evaluate some of the project's environmental effects. Specifically, we believe the assessment of the project's impacts on the surrounding area, including the potentially significant impacts of the proposed tunnel, and the fabrication site need additional analyses. The attachment contains our detailed comments on these issues.

In accordance with our national EIS rating criteria, a copy of this letter and the enclosed comments have been placed in this Draft EIS EN-2 (environmental reservations - additional information requested).

If you have any questions about our comments, I hope that you will contact Donald Cooke of my staff at (617) 223-1738 as soon as possible so that any differences can be resolved prior to the release of the Final EIS. Please send five copies of the Final EIS when the document becomes available.

Sincerely yours,

Paul A. Sutton
Paul A. Sutton, P.E.
Regional Administrator

Enclosures

cc: Fred Downs, FHWA-Albany
Frank Brasaglia, FHWA-MA
Justin Radio, MA-DPM
J. William Oliver, MA-DPM
Joseph Ignazio, COE-MED

U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL COMMENTS
THIRD HARBOR TUNNEL PROJECT, I-90, BOSTON, MA
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Project Description

The proposed action will extend Interstate Route 90 (the Massachusetts Turnpike) from its present terminus at the Central Artery in Boston across Boston Harbor, the South Bay, and an Airport area in East Boston. The Third Harbor Tunnel and associated roadways will be a four-lane, limited access toll highway, approximately 3.3 to 3.8 miles in length and with certain improvements to the Central Artery depending on which alternative is selected. Based on an Airport Corridor Planning Study for Route I-90, the Central Artery will be widened to four lanes in each direction. The proposed action includes four "build" alternatives and the "no-build" (base case) alternative were recommended by the Massachusetts Department of Public Works and approved by the Federal Highway Administration for detailed analysis in the EIS. The "build" alternatives are as follows:

Alternative 1 involves the construction of a one-way, five-lane northbound tunnel through Fort Point Channel. Near the mouth of the channel, three toll-free lanes would reconnect to the Central Artery northbound and two lanes would cross Boston Harbor to a new toll plaza in East Boston. The tunnel's two southbound lanes would run in the same structure from East Boston to the mouth of Fort Point Channel. Connections to the Central Artery southbound just before the Dewey Square Tunnel, which would be a one-way southbound, in East Boston, the tunnel would lie within the Conrail railroad right-of-way and industrial land next to Green Street with an open toll plaza between Cove and Porter Streets. A new Dorchester Avenue would be constructed above the tunnel structure in Fort Point Channel.

Alternative 2 consists of the same "split" alignment and improvements to the Central Artery on the Boston side as Alternative 1. However, the alignment would follow a more easterly course under Boston Harbor, pass between Bird Island Plaza and Jeffries Point, and surface at Logan Airport.

Alternative 3 involves the construction of a two-way, four-lane tunnel from the Massachusetts Turnpike/Central Artery interchange through Fort Point Channel, across Boston Harbor and into East Boston along the same westerly "railroad" alignment as Alternative 2.

Alternative 4 consists of the same "two-way" alignment as Alternative 3, but would cross Boston Harbor into Logan Airport along the same easterly alignment as Alternative 1.

404 Activities

The Boston Harbor crossing will use the "sunkn tube" construction method, with each precast concrete, either reinforced concrete, or steel section measuring 35 to 38 feet high by 18 to 20 feet wide. The top of the tunnel sections will be 10 feet below the water surface. The tunnel sections will be placed in a channel 52 feet allowing a minimum cover of 7 feet below the proposed deepened shipping channel.

Construction of the sunken tube tunnel across Boston Harbor will require excavation of approximately 2.1 million cubic yards of marine sediment for the Harbor and 1.5 million cubic yards of marine sediment for the Airport area. The sediment for the Airport Alignment (Alternatives 3 and 4). This marine sediment has been tested and is considered by EPA to be acceptable for disposal at the Massachusetts Bay Foul Area. However, the dredging activity may have to be sequenced in order to allow more contaminated sediments to be capped with cleaner sediments at the Airport area. The dredging activity will be designed from Boston Harbor and other clean-up restoration efforts on Spectacle Island in Boston Harbor, or at the Lynn Harbor site if timing were suitable. These possible beneficial uses of dredged material have merit and should be discussed in further detail in the final EIS.

The Draft EIS states on page 234 that regardless of the build alternative selected, facility construction will result in the filling of 9.5 acres of open water in the South Bay area of the Fort Point Channel. We believe the final EIS should explore alternatives to filling as well as possible mitigation to minimize this loss.

The Lynn Marine Industrial Park in Lynn, Massachusetts is proposed as the site for fabrication of concrete tunnel sections. This action involves dredging 5 million cubic yards of sediment from a 75 acre shallow water area which includes 21 acres of linear tidal blue mussel littoral forming a dry dock area. The sediment will be placed in the Lynn Harbor, where it will be covered by a layer of clean sediment at the Massachusetts Bay Foul Area. Dredging of the Lynn Channel to allow the transportation of the tunnel sections may also be required. After fabrication of the tunnel sections, the dry docks would be destroyed; however, a channel and possible berthing area approximately 30 feet in depth will remain.

The final EIS should evaluate project impacts at the Lynn fabrication site and address possible mitigation. Impacts of concern that should be discussed in the final EIS include: time period required for construction of the dry docks; construction impacts on water quality in Lynn Harbor, Prime River, and the Lynn Channel; on the Saugus Water Treatment Plant; and on the Lynn Channel. The final EIS should also evaluate the impacts of the dry docks on open transport tunnel sections and resulting impact from pollutants and sediments released; future uses of the basin and

deepened channel with discussion of secondary impacts; and, the mitigation for the loss of shellfish habitat in Lynn Harbor.

Additional sediment testing will be necessary to determine the acceptability of the Lynn Harbor sediments for disposal at the proposed site. The Corps of Engineers is currently conducting sediment testing by means of engineers in the nearby Navigation Channel; however, the proposed dry dock area is sufficiently removed from the channel to warrant separate testing. Should project timing coincide with landfill capping at Lynn, the Draft EIS proposes use of the marine clays from the proposed dry dock area to fill the landfill. The use of either of the two nearby landfills for further disposal of this material would be a beneficial use of dredged material should be discussed in the Final EIS including the method and location of dewatering and transport of dredged material.

The Draft EIS mentions but does not assess in any detail the use of existing dry docks in the region as alternatives to development of the Lynn site. We believe that, given the potentially extensive impacts in Lynn Harbor, the use of existing dry docks, especially in the project area, warrants more serious consideration in the Final EIS.

Air Quality - Non-Point Source

Air quality impacts are presented in the Draft EIS as separate sources from roadways, toll plazas, tunnels and ventilation buildings. However, many receptors are impacted by several of the project components and should be evaluated for total impact. The Draft EIS should include a section on non-point sources (including background) at each receptor, identifying the contributing sources. Only after the calculation of total air quality impact on a receptor can a true assessment of air quality improvement or degradation be known, and the various "build" and "no-build" alternatives be compared.

The air quality analysis assumed that the following six projects would be completed by 1990: the Central Artery North Area Project; the deck replacement on the Central section of the Central Artery; the Southeast Expressway upgrading project (creating four lanes in each direction to the Dewey Square Tunnel); the proposed South Station Transportation Center; and the relocated Northern Avenue Bridge. We believe the Final EIS should consider the possibility that some of these projects may not be completed. Should any of these projects not be completed within the assumed timeframe then the traffic impacts of the proposed project could change, requiring that the air quality impacts be reanalyzed.

The Draft EIS evaluates the effects of various toll collection practices for all four "build" alternatives and the "no-build" (pages 172-177). As you know, Massachusetts Turnpike Authority and Massachusetts Port Authority are preparing to conduct an

experimental study of one-way toll collections for the Callahan/Summer Tunnels and the Mystic-Tobin Bridge. We believe the results of this study should be incorporated into the Final EIS.

The "Construction Impacts" section (page 221-235) of the four alternatives should discuss the potential for air quality impacts. Construction could result in temporary adverse air quality impacts. The Final EIS should discuss with as much detail as possible the detour routes for the chosen alternative. The Final EIS should also emphasize mitigation measures such as traffic control measures and improved mass transit service in the affected areas.

The Third Harbor Tunnel's planning and project level conformity with Massachusetts' State Implementation Plan (SIP) is addressed in Section 4.6 of the Draft EIS, page 196. We agree with this discussion only as it relates to the planning level conformity, and disagree with the statements concerning project level conformity. The project level conformity analysis should include the project improvement program for the Metropolitan Area Planning Council area. Therefore, pursuant to 23 CFR 770, this project conforms to the SIP. Since the project conforms to the SIP, a mesoscale air quality analysis is not required from the federal standpoint. It has been performed at the project level by the Metropolitan Area Planning Council (Metropolitan Area Quality Engineering) requirements. We do not agree that, because a proposed project is part of an approved plan or program, the project need not be evaluated for project level conformity with the SIP. As you know, Massachusetts' SIP, which is federally approved, has specific project level criteria and detailed procedures (Appendix J) for determining project level conformity.

Air Quality - Point Source

The Draft EIS states that effects from ventilation buildings on the surrounding carbon monoxide concentrations are not included in the analysis. This conclusion is not discussed. Scaling results in Table 4.5 (page 203) indicate that eight-hour carbon monoxide concentrations in excess of 1,000 micrograms per cubic meter (10% of the National Ambient Air Quality Standard) are possible. EPA considers an increase in one-hour carbon monoxide concentrations of 500 ug/m³ from a new point source, to be "significant". The carbon monoxide impacts of the ventilation building should be quantified in the Final EIS and included in the total impact calculation.

In screening for worst case concentrations from the ventilation buildings, wind blowing directly to the receptor should be used instead of sixteen compass directions (Appendix J - Air Quality, page 10). The sixteen direction method is likely to underestimate worst case impacts at many receptors.

The air quality appendix incorrectly states that a stable atmosphere corresponds to D stability. Actually, D stability corresponds to a neutral atmosphere. The final EIS should identify whether a stable or neutral atmosphere is modeled. For the ventilation building emissions analysis, both stable and unstable conditions should be modeled. The appendix (class A) is the appendix that indicates that an unstable atmosphere. The final EIS should identify the correct statement and make the necessary changes to reflect this statement.

We discussed previously with the air quality consultants, the Volume 10 (EPA) screening model procedure for estimating the critical wind speed does not apply to building downwash situations. Volume 10 states that the UNAP models used in the EIS analysis, DRTS2 (PTMAX) and DRTS1 (PRINT), are not applicable to downwash situations.

The use of only one or two stability classes, a single wind speed and 16 compass directions in EPA's Industrial Source Complex Model (ISC) does not constitute an adequate worst case screening procedure. The final EIS should contain a "far-field" analysis in accordance with our modeling procedures for downwash in urban areas. EPA Region I modeling procedures for downwash in urban areas require the use of a "far-field" analysis. The modeling procedures should include a "far-field" analysis along a straight line between the source and the receptor. The combinations are:

Stability Class	Wind Speed (meters per second)
A	1, 3
B	1, 3, 5
C	1, 3, 5, 10
D	1, 3, 5, 10, 15
E	1, 3, 5

Finally, the Hiltzky paper mentioned on page 15 of the air quality appendix should be included in the reference list.

EVALUATION OF EPA RATING

Environmental Impact of the Action

LD -- Lack of Objections

EPA has no objections to the proposed action as described in the draft environmental impact statement; or suggests only minor changes in the proposed action.

EA -- Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating federal agency to reassess these aspects.

DU -- Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential for adverse effects on the environment may be reduced by the implementation of certain measures. EPA has asked the originating federal agency to reassess the action to be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1 -- Adequate

The draft environmental impact statement sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2 -- Insufficient Information

EPA believes that the draft environmental impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. EPA has asked the originating federal agency to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft environmental impact statement.

Category 3 -- Inadequate

EPA believes that the draft environmental impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft environmental impact statement is assigned a Category 3, no rating will be made of the project or action since a basis does not generally exist on which to make such a determination.

RESPONSE TO COMMENTS BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION I
(March 17, 1983)

36. See Section 4.13 of the FEIS/FEIR for a discussion of potential disposal areas and beneficial uses of dredged material.
37. The Preferred Alternative has been refined to minimize the amount of fill necessary in the Fort Point Channel. The tunnel profiles have also been revised (see Section 4.11 FLOODPLAINS).
38. As discussed in the FEIS/FEIR, the cross-harbor tunnel materials have not been selected at this time. The DEIS/DEIR incorrectly indicated the tunnel would be concrete, when actually steel tubes have not been eliminated. Steel tubes could be fabricated at a number of existing East Coast shipyards. Additional environmental analysis and necessary documentation on the impacts of the fabrication site will be performed before the tunnel material is selected. Therefore, further analysis of the Lynn Harbor site at this time is premature.
39. Tables 39 and 40 of the DEIS/DEIR represent total impact from all sources, including roadways, toll plazas, intersections, and ventilation buildings. The effects of the vent emissions on maximum 1-hour CO concentrations under the set of meteorology conditions (D stability with 1 m/sec wind) that would result in high CO concentrations from the at-grade highways and local streets are quite small relative to the mobile source contributions. Under different atmospheric conditions, the impact of the vent emissions on 1-hour CO concentrations could increase. However, under these conditions, the contributions from the motor vehicle sources at grade level would be small. Consequently, the results shown in Tables 39 and 40 (and in Tables 38 and 39 in the DEIS/DEIR) represent contributions from all sources and are indicative of maximum 1- and 8-hour CO concentrations. For the Preferred Alternative, see Tables 48 and 49.
40. The Preferred Alternative now incorporates some of the projects referenced in this comment. Analysis has been based on these assumptions and the revised analysis has been discussed with EPA.
41. The FEIS/FEIR recognizes the recent implementation of one-way tolls: all Massachusetts Turnpike Authority tunnels will be operated with the same toll collection strategy, including the Third Harbor Tunnel. The effects of a one-way toll on the results for the existing tunnels are reflected in the air quality analysis of the Preferred Alternative.
42. Consistent with the analyses for all of the other alternatives, the air quality impact during construction of the chosen alternative is also qualitative in the FEIS/FEIR. Potential mitigating measures are identified and their effects described qualitatively. FHWA and MDPW, however, have indicated that a detailed analysis of the traffic detour routes and the resulting CO concentrations at key locations will be performed during the design phase. Mitigating measures will be re-evaluated at that time.
43. As stated in Section 4.7 AIR QUALITY, the conformity statement has been revised to acknowledge a requirement for project level conformity certification. Massachusetts DEIR's Appendix J document.
44. The revised air quality analysis for the Preferred Alternative addresses CO impacts of the ventilation buildings. This analysis has been reviewed by EPA.

45. Plume centerline direction would lead to maximum concentration for a single source-receptor environment. For multi-source environment, this is not necessarily true. Using 36 wind directions, which would require a substantial increase in computation effort, would not significantly affect the results obtained with the 16 wind directions. A separate sensitivity computer run using one alternative has been performed and submitted to EPA for review. To maintain consistency, all alternatives have been analyzed using the same 16 wind directions.

46. The Appendix to the DEIS/EIR incorrectly relates a "D" stability to a stable atmosphere. The Appendix to the DEIS/EIR corrects this by stating that a neutral or D stability was used for the mobile sources. For the Preferred Alternative, D stability was also used (see FEIS/FEIR, Appendix 4 - AIR QUALITY).

47. This issue has been resolved in the DEIS/SDEIR and the FEIS/EIR: see Section 4.7 AIR QUALITY in both reports.

48. The air quality analysis has been revised consistent with EPA's comments and has also been reviewed by EPA.

49. EPA Region I's procedures of using 16 stability and wind speed combinations were implemented on all alternatives, as described in the DEIS/SDEIR, and in the FEIS/FEIR.

50. The omission with respect to Halitsky's paper was corrected in the References section of Appendix 3 to the DEIS/SDEIR, and Appendix 4 in the FEIS/FEIR.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Center for Disease Control
4900 Old Derby Road
Hyattsville, MD 20785
(404) 452-4095
March 11, 1983

Mr. Norman J. VanDess
Division Administrator
Transportation Systems Center
55 Broadway Street
Cambridge, Massachusetts 02142

Dear Mr. VanDess:

We have reviewed the Draft Environmental Impact Statement (EIS)/Report, Third Harbor Tunnel Project, Interstate 95, Boston, Massachusetts. We are responding on behalf of the U.S. Public Health Service.

Air quality impacts will generally be beneficial in the long-term when compared to the no-build alternative, and adverse impacts that may occur during some periods of construction due to increased traffic congestion at certain "hot spots" are considered short-term and insignificant with mitigation efforts. However, our concern lies in the potential impacts of a build-up of air pollutants (CO and NO_x) within the tunnel if mitigation efforts ever failed. Therefore, we urge the implementation of an appropriate standby ventilation system to be installed and tested prior to the start of construction. In addition, we recommend that an emergency plan be developed so specific procedures can be taken if an eminent health risk developed within the tunnel resulting from any unforeseen circumstances (i.e., mechanical ventilation failure, car accident, fire, sabotage).

None of the "build alternatives" should have significant effects on long-term water quality or water ecology, with the exception of a potential thermal discharge from the tunnel. If the Corps of Engineers determines that this discharge should be relocated, we believe the relocation of this discharge should be mandatory to mitigate this potential adverse impact.

We also have concerns regarding potential short-term water quality degradation resulting from dredging operations. Previous tests have indicated contamination of sediment at the construction site, and the Corps of Engineers has indicated that the dredging operation will last a maximum of 250 working days and a sediment plume of approximately 110 meters will exist. We recommend that water be analyzed for contaminant levels periodically during dredging, and following the completion of dredging to determine if mitigation measures are adequate. All four build alternatives will encroach on some floodplain area. The maximum encroachment is 23 feet, which is less than two percent of the total floodplain area. We believe that the Corps of Engineers should consider the impact of encroachment, the Final EIS should indicate if the proposed project is compatible with the intent of Executive Order 11988, Floodplain Management.

Page 2 - Mr. Norman J. VanDess

Other potential adverse impacts of concern, namely noise, pedestrian safety, relocation requirements, hazardous cargo, and accident potentials, have been adequately addressed in this draft document.

Thank you for the opportunity to review this document. We would appreciate receiving a copy of the Final EIS when it becomes available. If you have questions concerning our comments, please call Mr. Dan Molt of our staff at FTS 238-6649 or (404) 262-6649.

Sincerely yours,

Frank S. Lisalle

Frank S. Lisalle, Ph.D.
Chief, Environmental Affairs Group
Environmental Health Services Division
Center for Environmental Health

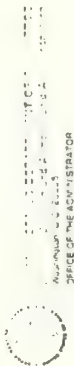
RESPONSE TO COMMENTS BY THE U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES, PUBLIC HEALTH SERVICE (March 11, 1983)

51. The increased health risk in the tunnel under a contingency situation is recognized in both the DEIS/DEIR, the SDEIS/SDEIR, and the FEIS/FEIR. Mitigating measures and other detailed contingency planning for emergencies will be developed in detail during the design phase. See Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE, for a discussion of measures to be included in the project for emergency situations.

52. See Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE, and Section 4.9 WATER RESOURCES, for a discussion of this issue.

53. A water quality monitoring program during the proposed dredging for the Third Harbor Tunnel and construction of the northbound Central Artery in Fort Point Channel is planned, as included in Section 4.9.5 Mitigating Measures in the Water Resources section of the FEIS/FEIR. Specific details, however, would be developed during the design phase and most likely would be included as part of the overall permit conditions from the U.S. Army Corps of Engineers (COE). Additional water quality monitoring would also be conducted at specific locations where industrial use of seawater occurs.

54. A finding is only needed if significant encroachment in floodplains will occur; since the Preferred Alternative does not have a significant encroachment (see Section 4.11 FLOODPLAINS), a Floodplain Finding is not required.



April 13, 1983

Mr. Justin L. Radlo, P.E.
Chief Engineer, Department of Public Works
100 Nahub Street, Room 510
Boston, Massachusetts 02114

Dear Mr. Radlo:

This is in reference to your Draft Environmental Impact Statement for the Third Harbor Tunnel Project, Interstate 90, Boston, Massachusetts. Enclosed are comments from the National Oceanic and Atmospheric Administration.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving four copies of the final environmental impact statement.

Sincerely,

Joyce M. Wood
Joyce M. Wood
Chief, Office of
Ecology and Conservation Division

Enclosure

10TH ANNIVERSARY 1970-1980
National Oceanic and Atmospheric Administration
in valuing agencies with a history
of service to the Nation

UNITED STATES DEPARTMENT OF COMMERCE
FISH AND WILDLIFE SERVICE
HABITAT PROTECTION BRANCH
7 Pleasant Street
Gloucester, MA 01930

Rev #1
ECD:W

April 5, 1983

Mr. Justin L. Radlo, P.E.
Chief Engineer
Massachusetts Department of Public Works
100 Harbor Street, Room 550
Boston, Massachusetts 02110

Dear Mr. Radlo:

This is in reference to the Draft Environmental Impact Statement (DEIS) for the Third Harbor Tunnel Project, Interstate 90, Boston, Massachusetts.

It is the primary concern of the National Marine Fisheries Service that adverse impacts to fishery resources and habitats be avoided or minimized to the extent possible. Our objective in reviewing this DEIS is to ensure full consideration of these resources and to encourage the conservation of wetlands, intertidal areas and living marine resources.

The proposed Lynn Harbor concrete tube fabrication site, impacting 75 acres of productive and biologically rich intertidal habitat and creating 5 X 10⁶ cubic yards of spoil, will result in far greater impacts to marine resources than the proposed tunnel construction in Boston Harbor. To adequately assess the effects of the proposed project and to select appropriate alternatives and/or mitigation, we recommend that the following additional information be provided in the Final Environmental Impact Statement (FEIS).

1. A quantitative discussion and analysis of the marine resources within the Lynn Harbor area should be included in the FEIS. The analysis should include an assessment of the potential temporary and permanent effects to fishery resources and the biological productivity of the area.

2. Alternative fabrication sites which are less environmentally damaging should be sought. These should be fully discussed in the FEIS to provide sufficient information, to the alternative, and the selection may be adequately evaluated. The analysis should address impacts to resources and attempt to replace lost habitat or resources through mitigation.

3. The use of the Massachusetts Foul Area as a dredge spoil disposal site is presently being reevaluated. Preliminary information indicates that fine grained non-cohesive materials are not contained at the site, but are dispersed into the marine environment. Therefore, we recommend that alternative disposal sites for dredge material, including upland areas, be investigated.

We hope these comments will be useful to you in preparing the FEIS. If you have questions, please contact Susan Mello at 281-3600, ext. 317.

Sincerely,

Ruth Bablous
Ruth Bablous
Branch Chief

RESPONSE TO COMMENTS BY THE U.S. DEPARTMENT OF COMMERCE, NATIONAL MARINE FISHERIES SERVICE (April 5, 1983)

55. and 56. See previous response to comments 32 through 34 and 38 (by EPA and the Corps of Engineers). As discussed at a coordination meeting with the NMFS, the U.S. Fish and Wildlife Service, EPA, and the COE, the selection of a tunnel material (concrete or steel) is an unresolved issue. FHWA and MDPW are committed to performing additional environmental analysis and any necessary documentation of the impacts of the tunnel fabrication site.

57. Since the dredge materials are suitable for disposal at sea, this method will be pursued unless the Foul Area becomes unavailable in the future. See response to previous comments by EPA and COE.



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, DC 20500

BR 12/162

APR 7 1963

Mr. Norman J. Van Ness
Division Administrator
Federal Highway Administration
Transportation Systems Building
55 Broadway
Cambridge, MA 02142

Dear Mr. Van Ness:

This responds to a request for the Department of the Interior's comments on the draft environmental/Section 4(f) statement for Third Harbor Tunnel Project (I-90 extension from I-93 to East Boston), Suffolk County, Massachusetts.

SECTION 4(f) STATEMENT COMMENTS

We concur that there are no feasible and prudent alternatives to the use of land from the East Boston Memorial Stadium, Bird Island Plaza Park, and the Fort Point Channel Historic District, should the Federal Highway Administration determine that one of the build alternatives is necessary to satisfy the transportation needs of the Boston area.

We also concur that the measures to minimize harm addressed in the draft statement are adequate. We especially recommend mitigation of impacts to the Old Colony Railroad and the Boston Harbor area. The draft statement also addresses impacts to the Boston Harbor area, the Boston Harbor Commission, the Boston Landmarks Commission, and the Boston Parks and Recreation Department, should be incorporated into mitigation design plans, and the results of continuing consultations with these agencies reported in the final statement.

ENVIRONMENTAL STATEMENT COMMENTS

Since the Third Harbor Tunnel Project may ultimately generate increased local traffic loadings, the final statement should address possible future actions that may result from such increases. These actions might include major reconstruction of the Central Artery, new highways connecting the Northshore with East Boston and/or I-90, and new Interstate or expressway/junk near or in the old I-95 on other corridors.

The proposed Lynn Harbor fabrication site will have far greater impacts to fish and wildlife resources than the proposed tunnel. Although the draft statement gives a qualitative sketch of species found in the area, it does not contain sufficient data to provide an assessment on how the biological productivity of the Lynn Harbor area (including the Pines and Saugus Rivers) will be impacted by the removal of 5 million cubic yards of material from 75 acres of productive shallow water/intertidal habitat. The draft statement also fails to emphasize the importance of the area for waterfowl wintering habitat, especially Black ducks. The Black duck is an important waterfowl

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Mr. Norman J. Van Ness

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species in the Northeast whose population has been declining. Although all the reasons for this decline have not been identified, the loss of critical wintering habitat is a major factor.

New London, Connecticut and New Haven, Connecticut were identified as other possible fabrication sites for steel tube construction. If steel tube construction is used, these tubes could be fabricated at one of several East Coast shipyards. The draft did not identify any specific locations. The New England River Basins Commission's September 1981 Ports and Harbors Study identifies potential environmental constraints for both New London and New Haven. The New London Mills area is some distance from the navigation channel and contains highly valuable fish and wildlife resources which would most likely preclude the development of a fabrication site there. The general prohibition in New Haven against steel tube construction is also a consideration. The environmental safeguards in both dredging and spoil disposal. Also the 1981 New England River Basins Commission Study indicated that non-port development was proposed for the United Steel Buildings area in New Haven. This may preclude New Haven as a viable alternative to Lynn.

In our opinion, unacceptable environmental consequences are associated with possible fabrication sites of concrete tubes at Lynn, New London, or New Haven. These sites, as well as the proposed Lynn Harbor site, are not environmentally acceptable. It is our opinion that an environmentally acceptable site can be selected, including appropriate mitigation. Study criteria should include avoidance of areas of resource significance, such as waterfowl wintering areas, shellfish beds, fishing grounds, spawning and nursery areas. Avoidance of adverse impacts is much more desirable than trying to replace lost habitat values and implementing appropriate mitigation measures.

Although fabrication sites for steel tube construction were only identified as East Coast shipyards, we assume that deep water would be available and that dredging would not be required. If this is correct, then it would appear that the destruction of 75 acres of shallow water/intertidal habitat can be avoided as well as the disposal of 5 million cubic yards of dredge material. The final statement should fully evaluate all impacts for both concrete and steel tube fabrication sites so that the alternative selection as well as mitigative requirements can be made in a sound environmental manner.

We agree that the Foul Area has been designated and used as a disposal site for dredged material, but the draft statement does not fully reflect the fact that present use of this area is currently being reviewed and reevaluated to determine if existing environmental controls/regulations are adequate or if further refinement is dictated. The Corps of Engineers, in cooperation with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, Environmental Protection Agency, and the Commonwealth of Massachusetts, is monitoring settling and disposal of polluted dredged material in the Foul Area. The draft statement does not indicate that fine grained, non-cohesive materials are dispersed into the Georges Bank environment and not contained at the Foul Area.

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Mr. Norman J. Van Ness

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The draft statement indicates that, depending on availability of Federal funding, construction could start in late 1988 and would continue for 1 or 4 years depending on which alternative is selected. By 1988, the present criteria for dredging and disposal of polluted sediments could change. The final statement should recognize this possibility and address upland containment (or polluted material in reduction, specific provisions for the beneficial use of non-polluted material should be addressed.

The discussions of dredged material disposal alternatives in Appendix 2 is misleading. Discussions are in context of the proposed Corps of Engineers' navigation improvement for Boston Harbor and imply that dredging and spoil disposal for the harbor tunnel will follow established procedures. Comments should be clarified to show that the Corps of Engineers is not currently engaged in further navigation improvement for Boston Harbor. It is likely that the Corps will be engaged in further navigation improvement for the harbor tunnel would be initiated prior to any navigation improvement dredging.

FISH AND WILDLIFE COORDINATION ACT COMMENTS

The draft statement identifies significant Government Action and non-Federal projects associated directly with tunnel construction, but does not provide a partial treatment for Lynn Harbor or other alternate fabricating sites. Government and non-Federal actions should include this information.

Given the magnitude of the Third Harbor Tunnel Project, we recommend that, prior to the release of the final statement, the project sponsors develop, in coordination with concerned agencies, mitigation plans for the selected and/or preferred alternatives that will result in full compensation for all unavoidable adverse impacts. These mitigation plans should be clearly identified and documented in the final statement. These mitigation plans should also be included in the Record of Decision under Section 1505.2.

In future interrelated Federal reviews, including permit actions, the U.S. Fish and Wildlife Service advises that it will most likely object to any project related construction unless all significant avoidable adverse impacts have been avoided and that adequate mitigation has been provided. We recommend that you undertake further consultation with the Fish and Wildlife Service prior to developing the final statement.

SUMMARY COMMENTS

The Department of the Interior has no objection to Section 4(f) approval of the Third Harbor Tunnel Project, providing the measures to minimize harm discussed above are adequately addressed in the final statement.

We find, however, that the draft statement is not adequate in its discussion of adverse environmental impacts related to tube fabrication sites and dredged material disposal. As presently proposed, the alternative tube fabrication and dredged material disposal

Mr. Norman J. Van Ness

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sites, as well as the management practices associated with these sites, are environmentally unacceptable. These sites are also environmentally unacceptable to the residents of the final project. The final statement should refer to the project to the Council on Environmental Quality in accordance with Section 1504 of the Council's regulations.

Our bureau at the field-level would be pleased to work with you, the project sponsors, and all other concerned agencies, to expeditiously resolve the above matters so that such resolution may be included in the final statement. For issues related to fish and wildlife, contact the Field Supervisor, U.S. Fish and Wildlife Service, P.O. Box 1518, Concord, NH 03301 (phone: FTS 334-4197; comm. 603-224-2385). For issues related to parks, recreation areas, and cultural resources, please contact the Regional Director, Mid-Atlantic Region, National Park Service, 143 South Third Street, Philadelphia, PA 19106 (phone: FTS 597-7031; comm. 215-597-7032).

Thank you for the opportunity to provide these comments.

Sincerely,

Shirley Blanchard, Director
Environmental Project Review

cc: Mr. J. William Oliver
Massachusetts Department of Public Works
100 Markua Street, Room 330
Boston, Massachusetts 02114

RESPONSE TO COMMENTS BY THE U.S. DEPARTMENT OF THE INTERIOR, OFFICE OF THE SECRETARY (Apr. 17, 1983)

58. Consultation results are presented in the FEIS/FEIR in Chapter 5.0 SECTION 4(f) EVALUATION; a Section 106 Memorandum of Agreement is included in COMMENTS AND COORDINATION in the FEIS/FEIR.

59. The SDEIS/SDEIR and FEIS/FEIR both address needed improvements to the Central Artery, with a widened and depressed facility. Although traffic volumes are projected to increase in the future, the need for other large-scale highway improvements in the North Shore area are not anticipated and are not consistent with the Commonwealth's transportation policies.

60. See response to comments 55 and 56. Comments regarding the Lynn Harbor Fabrication site were addressed at a joint coordination meeting with the U.S. Fish and Wildlife Service, the U.S. Environmental Protection Agency, the U.S. Army Corps of Engineers, the National Marine Fisheries Service, and the FHWA/MDPW on May 12, 1983. As stated at that meeting, the material for tunnel fabrication (concrete or steel) has not been selected at this time; as a result, an extensive evaluation of alternative fabrication sites is not appropriate at this time. FHWA and MDPW are committed to performing the necessary environmental analysis and documentation of the proposed fabrication site(s). This commitment is identified in the FEIS/FEIR, and the selection of the materials for sunken tube tunnel construction is identified as a significant unresolved issue.

61. Disposal of dredged materials shall conform to the regulations in effect at the time of permit application.

62. The discussions in Appendix 7 of the DEIS/DEIR relating to dredged material disposal and the Corps of Engineer's navigation improvements in Boston Harbor were intended to indicate the similarities between the COE's Project and the Third Harbor Tunnel Project in terms of volume requirements. The COE project evaluated several alternative disposal sites and the results of that evaluation were directly applied to the Third Harbor Tunnel study. Although, as DOI indicates, the COE proposal to deepen Boston Harbor is not currently active, it also has not been abandoned (see Comment No. 35 by the COE). The discussion regarding alternative disposal sites is still applicable. See also response to comments by EPA and the Corps of Engineers (Comment 36).

63. FHWA and MDPW will continue their coordination with the U.S. Fish and Wildlife Service. The FEIS/FEIR identifies mitigation measures which will be incorporated into the project plans.

File # 90-1(1)0

Advisory
Council On
Historic
Preservation

1323 K Street, NW
Washington, DC 20005

FEB 28 1983

Mr. Norman J. Vandase
Division Administrator
Federal Highway Administration
Transportation Systems Center
35 Broadway, 10th Floor
Cambridge, MA 02142

Dear Mr. Vandase:

Thank you for providing us with your Draft Environmental Impact Statement (DEIS) for the proposed 80' Thruway Project. We note that the undertaking will affect properties both included in and eligible for the National Register of Historic Places, identified in Section 3.10.1 of the DEIS.

We are pleased to note the extensive consultation that has taken place with the Massachusetts State Historic Preservation Officer. We look forward to receiving your request for our comments under Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470f), as discussed in Section 4.13.1 of the DEIS.

Thank you for your cooperation. If you have any questions, please contact Kate H. Perry at 202-254-3493.

Sincerely,

John L. Kline
Chief, Eastern Division
of Project Review

RESPONSE TO COMMENTS BY ADVISORY COUNCIL ON HISTORIC PRESERVATION
(February 28, 1983)

No response necessary.

The Commonwealth of Massachusetts

Department of Environmental Quality Engineering

Atmospheric Division - Industrial Branch

250 No. Boston Street, Boston, MA 02101



ATTENTION: O. G. CAMPBELL, JR.

727-5194

March 16, 1983

Massachusetts Department of Public Works
Central Artery Section
100 Nashua Street
Boston, Massachusetts 02111

Re: Interstate Route 90 - Third Harbor Tunnel

Gentlemen:

The DEQ/DAQ staff have reviewed the "Interstate Route 90 - Third Harbor Tunnel, Draft Environmental Impact Statement/Review," dated February 1983. We offer the following comments for consideration in preparing the final document.

A. Line Source Analysis -

- 1) Background values: Since worst case conditions as defined by NCEP-200 were met during on-site monitoring, the background values should have been derived from this data and not from the CO HRT SPOT study. It was our understanding that this was one of the main reasons for conducting the on-site monitoring.
- 2) Technical Support Documentation: When putting together the final report, it should include sufficient support documentation to allow the more technical reviewer to recreate sample sets of data for verification purposes (i.e., emission factors, a sample suite 2 run, a sample Caline-3 run).
- 3) Format: The reports' format does not clearly define the mesoscale or the microscale analysis section. They both appear to be interwoven within the air analysis section making it very difficult to review the individual analyses for each purpose. We suggest that the State Supplemental Information Plan be more clearly defined and that the case of the reviewer. While the order of presentation in the Appendix J outlines need not be strictly adhered to, all the information noted in them, must be included somewhere in the documents (i.e., roadway link characteristics for the mesoscale area, identification of roadway link length, etc.).

4) Data Consistency: A comparison was made of the data results for the East End Apartments receptor examined by both the Third Harbor Tunnel and the North Station reports. The analysis in both cases was prepared by the same consultant. The years of analysis were slightly different. The date of the Third Harbor report was 1982, 1990, 2010. The date of the North Station report was 1982, 1990, 2010. The two data sets for the two build cases only are presented below:

Receptor - East End Apts.	No Build Case	1987	2000
Analysis Years - (1982)	(1990)	(2010)	
1 Hour Carbon Monoxide (ppm)	10.7	4.6	3.3
	(18.0)	(11.0)	(7.0)
8 Hour Carbon Monoxide (ppm)	7.6	3.7	1.4
	(9.0)	(5.0)	(4.0)

e () = Third Harbor data

Normally, the data results should decrease over time due to the impacts from the Federal Motor Vehicle Emission Control Program. The data for the East End Apartments receptor shows a significant increase in the background values. This is a possible reason for this inconsistency. The same methodology was used in both cases. The same meteorological variables were used and the same background values were used. One possibility for some of the result differences may have been the emission factor used. It was noted in the North Station report that the 1987/88 description also to whether or not the data for the 1987/88 program in Massachusetts was taken. It was taken in the North Station Report. The description should be clarified to indicate this. Another area of the analysis leading to this discrepancy may have been the traffic data derivation. Two different methods were utilized in these analyses which resulted in different traffic data. The data for the East End Apartments receptor should arrive for a more consistent data base.

3) Persistence factor: The explanation in the air quality technical appendix (page 10) referring to the use of a 0.8 persistence factor is not clear. It is unclear what is meant by DEQ's Technical Memorandum on Persistence Factors. The 0.8 factor is used to adjust for the change in wind direction over the eight hour period only. DEQ has analyzed both wind speed and wind direction at several of its monitored sites. The results indicate that wind speeds can remain constant over an eight hour period while wind direction does not.

6) Speeds: The description on page 6 of the air quality technical appendix is unclear. Were the 772 speeds used in the analysis, or were the 772 speeds used. There is a need to clarify this in the report.

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7) Tables: The table on page 41 of the air quality technical appendix is misnumbered. This table is a continuation of Table 2 not Table 3.

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8) The statement made on page 196 of the main document is in reference to consistency with the Massachusetts Department of Transportation's implementation of the Highway Improvement Program (HIP) for the Boston region, the Highway element of the TIP has yet to be endorsed by the MPO. DCE has not signed off on the TIP to indicate a consistency with the State Implementation Plan (SIP) as yet either. Therefore, lacking MPO endorsement and SIP consistency, the project is not eligible to proceed to the next stage of the process. A mass transit analysis for this project as part of the EIS/EIS process.

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3. Stationary Source Analysis -

The point source analysis, as submitted, show potential violations of the Department's NO_x short term policy. The short-term NO_x policy states that the maximum concentration at any receptor may not exceed 120 ug/m³ for a one-hour period.

Vents identified as V0, V1, and V2 all show predicted concentrations in excess of 100 ug/m³. It should be borne in mind that the predicted concentrations mentioned above do not include background NO_x concentrations.

Since background concentration was not addressed in the Draft EIS/EIS, the writer performed a preliminary review of the 1980 NO_x values measured at the Boston Street, East Boston site. One of the values measured was 137 ug/m³. Based on the combined high background concentration and the high predicted hourly concentration (greater than 600 ug/m³) further analysis of the project should be conducted incorporating mitigating measures in order to ensure maintenance of air quality standards.

In conclusion, DAQC cannot recommend case/steady approval of this project until the problems discussed above have been addressed.

Very truly yours,
Michael J. Whitman
 Michael J. Whitman
 Chief
 Air Quality Control Section

- C- Secretary Hoyte, EOE
- C- Kenneth A. Adams, EPA
- C- Thomas J. Hollings, EPA
- C- Judy Wagner, MAPC
- C- Evette DePless, Metro. Boston/Northeast Region
- C- Neag Chung, BBN

MO/CN/dep
 (Planning Branch #6 File Disk)

RESPONSE TO COMMENTS BY THE MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL QUALITY
ENGINEERING (March 16, 1981)

64. Although NCHRP 200 conditions were met, EPA and DEQE felt the results from monitoring may have been somewhat low. In order to have conservative air quality results, EPA and DEQE decided to use the MDPW's North Area Project CO data and use a 4.4 parts per million (ppm) as a 1-hour background level for 1980. The colback technique was then used to estimate background of 4 ppm for 1982, 2.1 ppm for 1990, and 1.5 ppm for 2010. See Section 3.5 AIR QUALITY.

65. Samples of input and output files for a MOBILE 2 run, a CALINE 3 run, and an ISC run have been provided to DEQE. These sample files were in "hard copy" (printed) format.

66. The suggestion for a new format of presentation was accepted and reflected in the SDEIS/SDEIR and FEIS/FEIR. Mitigating measures for each of the potential impacts, as appropriate, are described within each of these impact categories. All of the modeling assumptions are provided in a separate technical appendix.

67. There are three primary factors that account for discrepancies between the Central Artery/Third Harbor Tunnel Study analysis and the BAA's North Station study:

- (a) I/M Credit. I/M credit was taken in estimating the emission factors for the North Station project but not for the Third Harbor Tunnel/Central Artery project. If I/M credit were taken for the Third Harbor Tunnel/Central Artery project, then the estimated CO for the Third Harbor Tunnel/Central Artery case would decrease, thereby making these two data sets more consistent.
 - (b) Different Traffic Data Base. Traffic for the North Station project was developed by the Boston Redevelopment Authority, and traffic for the Third Harbor Tunnel/Central Artery project was developed by the Central Transportation Planning Staff.
 - (c) Receptor Location Variance. The West End Apartment is a large complex and the receptor used to represent this complex in the North Station study (Receptor No. 18) is situated further away from the nearest roadway when compared with the "West End Apartment" receptor (Receptor No. 17) used in the Third Harbor Tunnel/Central Artery study. The receptor in the Third Harbor Tunnel/Central Artery study is also heavily affected by the traffic emissions at Leverett Circle, while the North Station receptor is not (See Figure 57 in Section 4.0). This locational variance is by far the most significant factor that would explain this difference in the modeling predictions.
68. The technical appendix reflects the use of a 0.3 persistence factor to adjust for the variability in the wind direction over the 8-hour period.
69. In all of the analyses, speeds generated by the Central Transportation Planning Staff were used.
70. As noted by DEQE, the caption for the table on p. 41 of Appendix 5 - Air Quality is a continuation of the table on p. 40 and should therefore read as follows, "Estimated Volumes for Alternative 2."

71. The MPO has endorsed the Transportation Improvement Program (TIP) element of the State Implementation Plan (SIP). Section 4.7 of the FEIS/FEIR describes conformity findings of the TIP's conformance with the SIP. However, it is also indicated that a mesoscale analysis has to be performed to see if the project also satisfies the hydrocarbon emissions criterion according to Appendix J of the Massachusetts DEQE's Transportation Project Level Guidelines.

72. The impact assessment in the FEIS/FEIR is based on the State's policy level of 320 ug/m³. Following a review of existing data, DEQE provided a set of background 1-hour NO₂ concentrations for use in the modeling analysis (see Section 3.5). These are 170 ug/m³ for receptor sites in East Boston, and 224 ug/m³ for sites elsewhere in the study area. See Section 4.7 AIR QUALITY, for an assessment of the effects of NO₂ and comparison to this policy level. In many instances, emissions from the proposed ventilation buildings, particularly along the Central Artery corridor, would exceed the policy level (when including background). Additional analysis and modifications to the ventilation system will be necessary to meet the policy level for the Preferred Alternative. It should be noted that existing and future No-Build Alternative NO₂ emissions also violate this policy level.



**MASSACHUSETTS
HISTORICAL
COMMISSION**

294 Washington Street
Boston, Massachusetts
02108

617-727-8470

March 16, 1983

Norman J. Van Ness
Division Administrator
FHA
Transportation Systems Center
1225 Broadway, Room 100
Cambridge, MA 02142

RE: Third Harbor Tunnel, Interstate Route 90, Draft Environmental Impact Statement
FHWA-MA-83-02-02-C

Dear Mr. Van Ness:

Staff of the Massachusetts Historical Commission have reviewed the Draft Environmental Impact Statement/Report for the Third Harbor Tunnel project referenced above, in compliance with Section 106 of the National Historic Preservation Act of 1966.

The DEIS/RA adequately documents the historic resources and archaeological potential of the project area. All alternatives, with the exception of the no-build alternative, will adversely affect the significant historic resources in the Shumac Peninsula end of the project area. However, it is impossible to apply the criteria of effect on archaeological resources with the proposed project, since the level of investigation required would exceed the volume of the DEIS/RA only identified archaeologically sensitive areas and not actual sites.

The industrial structures that line and define the Fort Point Channel and the Larnel Island structures are related to one another. The Fort Point Channel and Larnel Island structures are considered to be eligible for listing in the National Register of Historic Places as an historic district. The importance of the Fort Point Channel district as a locus of 19th-century transportation development and industrial change is clearly presented in the DEIS/RA and Historic Resources Inventory.

In all the alternatives, the Channel, an historically significant man-made feature, will be irrevocably altered by substantially reducing its historic size and configuration. The new tunnel structure, ramps and Dorchester Avenue roadway would introduce new visual elements without historic precedent and isolate the resources from their historic environment. The Rustic Wharf Buildings would also be directly cut off from their historic environment. The historic resources would be isolated from the Channel and Larnel Island, and the appreciation and understanding of their historic significance would be seriously affected. Noise and traffic generated also could introduce uncharacteristic elements in the historic environment. The discussion of mitigation is inadequate. An alternative deleting the new Dorchester Avenue roadways and ramps should be considered in addition to other alternatives which would avoid the Fort Point Channel.

The archaeological research indicates that a number of project study areas have a strong potential for the presence of significant historic and prehistoric archaeological properties. However, a locational survey was not conducted. HMC requests that an archaeological testing program be conducted in the South Cove project area to identify

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MAR 16 1983
COMMONWEALTH OF MASSACHUSETTS
Office of the Secretary of the Environment
and Natural Resources

MICHAEL JOSEPH CONNOLLY
Secretary of State

potentially significant archaeological properties. The results of the survey should be presented in the revised DEIS, in compliance with Advisory Council Procedures (36CFR800). Should additional alternatives be studied, archaeological background research and locational survey should be completed for the new study areas. If you have any questions concerning this review, please contact Brona Simon or Joseph Orfent of HMC staff.

Sincerely,

Valerie Talmage

Valerie Talmage
Executive Director
State Archaeologist
Massachusetts Historical Commission

cc: Robert McDonagh, HPM, Central Artery Section
James E. Hoyte, ESEA, NEPA Unit

VJ/as

RESPONSE TO COMMENTS BY THE MASSACHUSETTS HISTORICAL COMMISSION (March 14, 1983)

73. The Preferred Alternative minimizes encroachment into the Fort Point Channel as a result of the refinements developed subsequent to the SDEIS/SDEIR. See Chapter 5.0 SECTION 4(f) EVALUATION for a discussion of impacts to the Fort Point Channel and its historic environment. A Memorandum of Agreement is included in the DEIS/PEIR in COMMENTS AND COORDINATION.

74. With the addition of widening and depressing the Central Artery and a Third Harbor Tunnel via South Boston to the study, a Phase I, Step 1 archaeological survey of the expanded project corridors was undertaken. In conformance with the Section 106 Memorandum of Agreement, the Phase I, Step 2/Phase II Archaeological survey will begin 90 days following ratification of the MOA and release of funds for additional planning and design studies for this project. The FHWA and the MDPW are therefore committed to completing the Section 106 process. See also the Memorandum of Agreement in COMMENTS AND COORDINATION.

Secretary James S. Hoyce - 2 - March 16, 1983

Traffic

1. The DEIS points out that there will be a 30% increase on Route 1A traffic from the present level. This increase is based on the assumption that there will be approximately 20-25% increase in traffic at Bell Circle without the THT and only a 5-8% increase at Bell Circle with a third harbor tunnel. Is this reduction in traffic at Bell Circle caused by the THT reasonable? What are the changes in travel patterns that account for this reduction? The traffic impacts at Bell Circle do not appear to correlate with impacts on Route 1A.

2. South Boston -- Seaport Access

Although the DEIS makes an analysis of South Boston traffic, the document does not discuss the anticipated level of development in the area including new industrial growth, hotels, a civic center and SOCOM. Has the study been completed? If not, what level of development should be provided in the final EIS concerning how much and what kind of growth was accounted for.

3. Central Artery --

The Central Artery/Third Harbor Crossing Corridor Planning Study (CPS) completed in 1978 included the Central Artery and the Harbor Crossing alternatives. The DEIS includes four critical traffic alternatives (which are not the same as the CPS alternatives) for the harbor crossing alternatives and does not address major Central Artery improvements that may both improve the deficiencies on the Central Artery and the travel problems crossing the harbor. Alternative 4 in the CPS addresses both issues. However, the analysis of the THT does include some modifications to the Central Artery. The DEIS briefly discusses the modifications to the Central Artery. The DEIS does not address the question of whether these particular modifications were acted upon for consideration. Further information should be provided in the DEIS regarding the analysis applied in narrowing down the alternatives in the CPS to those analyzed in the DEIS.

4. Accidents --

Although the THT DEIS indicates total accidents will be reduced as a result of the project, no mention is made concerning whether severity of accidents will be affected. It is noted that average speed of travel will increase. Could it be inferred that there will be fewer but more severe accidents?

5. Parking --

How significant is the loss of parking in the Fort Point Channel area, along existing Dorchester Avenue, due to the various build alternatives? Will this parking be likely to remain under the no-build alternative?

6. Queuing --

The congestion point/queuing diagrams are difficult to interpret and require better explanation.

SECRETARY
JAMES S. HOYCE
110 TREMONT ST.
BOSTON, MA 02108
Tel. (617) 451-2770

March 16, 1983

The Honorable James S. Hoyce, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202
Attention: MEPA Unit

RE: Third Harbor Tunnel Project, Interstate 90
Draft Environmental Impact Statement/Report
MPC (EIS-83-7, Received January 19, 1983) ECEA 4425

Dear Secretary Hoyce:

In accordance with the provisions of Chapter 30, Section 62 of the Massachusetts General Laws, the Metropolitan Area Planning Council has reviewed the draft Environmental Impact Statement/Report for the Third Harbor Tunnel Project and has prepared the following comments as a result of staff review and the extensive involvement of MAPC representatives and advisory committees.

The proposed action will extend Interstate 90 (the Massachusetts Turnpike) from its present terminus at the Central Artery in Boston across Boston Harbor to a new terminus at Boston Harbor. The proposed action includes the no-build, one alternative, the two-bay alternative, and the two-bay alternative with a third harbor tunnel. The proposed action also includes the no-build, one alternative, the two-bay alternative, and the two-bay alternative with a third harbor tunnel. The proposed action also includes the no-build, one alternative, the two-bay alternative, and the two-bay alternative with a third harbor tunnel.

In general, MAPC believes that the draft EIR/EIS and the supporting materials presented a reasonable and balanced evaluation of the environmental impacts of the proposed action. The draft EIR/EIS and the supporting materials presented a reasonable and balanced evaluation of the environmental impacts of the proposed action. The draft EIR/EIS and the supporting materials presented a reasonable and balanced evaluation of the environmental impacts of the proposed action.

Our comments are as follows:

March 15, 1983

Land Use and Economic Impacts

1. If the Railroad Alignment through East Boston is chosen, current plans for the demolition of the existing structure and the construction of a new structure will place a further evaluation of the historical and architectural value of this structure should be conducted to determine if there is any potential for its preservation and reuse.
2. The Conceptual Relocation Plan Report provides limited information concerning the restrictions imposed by the historic location and the historic character of the area. The report states that the historic character of the area is such that the building of the new structure would be affected by any of the building alternatives, further information should be provided concerning whether these relocation benefits sufficiently compensate those affected businesses for their losses.
3. Although many businesses in the vicinity of the TWT will ultimately benefit from the proposed relocation, the report does not state that the potential for some businesses to fail during the construction period is mitigating measures are insufficient to offset the temporary problems of access, parking, and business disruption. The DEIS should provide further information concerning mitigating measures to alleviate construction impacts on businesses in the vicinity of the project which would not be relocated, including measures which would provide interim parking and vehicular and pedestrian access.
4. As the regional planning agency for the Boston metropolitan area, MAPC is particularly concerned about the regional impacts of the TWT. Although the DEIS provides extensive information concerning the localized impacts of the build alternatives, no attention is given to the potential impacts of the project to the wider metropolitan area. A project of this magnitude could conceivably impact the regional economy, particularly in the areas of increased residential housing and commercial/office development. Further information should be provided.

Noise and Vibration

1. Regarding noise impacts on sensitive receptors, some sensitive receptors location is not been included for analysis. At noise measurement location 5, the Franklin Street Residences, Alternatives 2 and 4 will result in increased noise levels. However, in the immediate vicinity are also the Donald McKay School and Our Lady of Mt. Carmel Church. The DEIS fails to mention the presence of these receptors, and does not report whether negative noise impacts will occur at these locations.
2. Concerning the noise barriers proposed as mitigating measures, the impacts of these barriers are not clearly illustrated. No diagrams or renderings other than aerial plans are presented depicting these walls. Although unlabeled illustrations are presented in the Visual Analysis section, these are not adequately described and do not illustrate all proposed barriers. The DEIS should provide a more detailed description of the noise barriers, particularly one-third of this public space with a ten foot high barrier, thereby creating a visual barrier that could impair the security of the area. Further information should be provided concerning the potential visual and social impacts of these noise barriers on the adjacent neighborhoods.

March 16, 1983

Historic Resources

This section appears to adequately address the impacts likely to result from the project alternatives although further investigation of the reuse potential of the Bublegum Factory Building is recommended (see comment #1 under Land Use and Economic Impacts).

Section 4(f)

This section appears to adequately address the impacts likely to result from the project alternatives.

Relocation Impacts

Contained in this section are discussions of the potential relocation impacts on each neighborhood under each of the five project alternatives. It is asserted that no residential properties will be taken under any of the five alternatives. It is therefore assumed that no residential relocation will be required.

1. This section fails to take into consideration that the project may force relocation of businesses located in the East Boston neighborhoods directly impacted by the project's secondary effects of: a) construction disturbances, b) the loss of community cohesion due to the physical division of neighborhoods, c) visual impacts that may affect values of abutting properties, and d) potential land-use changes (rezoning) due to business relocation. These conditions, in effect, force some households, particularly the elderly, to leave the neighborhood. The project's impact on the community is therefore more significant than the project's impact on the individual businesses. The magnitude of such impacts may be difficult but should be addressed, given the magnitude of this project, using appropriate social-science techniques. The report appears to adequately address issues concerning business takings.

2. Appendix 3, the Conceptual Relocation Plan Report, states much of what is contained in this section. It should be noted that the procedures that are to be implemented when relocation of business properties are effected, including the types of assistance available. However, the report fails to address the economic and social impacts of the relocating of business and the potential loss of jobs. That is, the issue of providing assistance to workers who either lose their jobs because their businesses are relocated or who are forced to leave their jobs because their business location is acquired by their employer. As stated above, these impacts should also be addressed using appropriate social-science techniques.

Water Quality/Hydrologic Impacts

Construction of the gunnery tube tunnel across Boston Harbor will require the excavation of over 2 million cubic yards of marine sediment. The dredging operation, which will last approximately 250 working days, will result in a suspended sediment plume over 1200 meters long and over 100 meters wide. This plume will increase sediment concentrations by as much as 114 mg/l. In addition,

March 18, 1983

there will be an increase in sediment-associated metals and other contaminants. Although the DEIS concludes that these concentrations are generally below the level at which significant adverse biological effects can be expected, it is reasonable to assume that there will be an increase in organism mortality, at least in the short term, due to the increased sediment levels. Thus, mitigating measures should be required, such as those suggested below.

1. The DEIS indicates that a silt curtain may be used to minimize turbidity caused by the maneuvering of vessels. Such a curtain should also be considered for containment of the plume. If such a mitigation measure is implemented, it should be required that the curtain be constructed and maintained in such a manner that the water quality does not exceed toxicity levels. Mitigation measures should be implemented immediately.

Has the possibility of using a hydraulic, rather than clamshell, dredge in combination with a temporary land-disposal site been considered?

2. In addition to the water-quality impacts of dredging, there will likely be significant odor impacts affecting a wide area. The high sulfide content of the sediments will create a "rotten egg" smell from hydrogen sulfide gas. This problem was not addressed in the DEIS.

3. Finally, while the DEIS cites an unknown Section 11 of the Army Corps of Engineers' Regulations for the Outer Continental Shelf, the DEIS states objectives to "avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative." The DEIS should have addressed consistency with this order, especially with respect to the floodplain-management guidelines that accompany it.

In general, Alternatives 2 and 4 would result in less dredging, less reduction of channel flushing time, and less water-quality impacts in comparison to Alternatives 3 and 5.

Visual Impacts

Many of the following comments should be addressed during the design stage of the project. They are presented to indicate concerns raised during our review of the preliminary design work included in the DEIS.

1. Alternative 2 --

South Bay

The South Bay Corridor is the visual entry point to downtown Boston from the Southeast Expressway and the Mass. Turnpike. How will landscaped spaces over ramps and removal of historic nautical elements in this area affect Boston's character as a port city? An effort should be made to reuse granite buildings and structures that are in the area and incorporate them into the design to reinforce the "port" character of Boston?

U.S. Water Resources Council Floodplain Management Guidelines," 43 FR 6020, 2-10-78

March 23, 1983

More information should be provided concerning design of the ventilation buildings. The buildings are mentioned throughout the section as becoming a new visual landmark.

More information should be provided concerning where pedestrian crossings connect Dorchester Avenue and South Boston neighborhoods. Pedestrian connections to the South End, landscape amenities to be used along walkways such as trees and lighting.

The visual impact to neighborhood areas adjacent to the Central Artery should be considered. Turnpike interchange (China/South Cove area) should be described.

Fort Point Channel

The tunnel and relocated Dorchester Avenue will alter the appearance of existing roadways, bridges and the channel. Is there a creative solution to the visual impacts of the proposed project? The significant views along the channel, and the wharf line identity?

Pedestrian connection between downtown Boston and the proposed Fort Point Channel waterfront walkway is crucial to the success of the walkway system. Are two connections adequate? Safety precautions should be described. Could overpasses be incorporated into pedestrian linkage of these areas?

East Boston

In Option 1 the unattractive walls on either side of the railroad right-of-way along Bremen Street form physical as well as visual barriers between two neighborhoods. This also creates unusable space above the right-of-way adjacent to a residential area.

Option 2 is intended to solve more of the visual and functional problems created by the tunnel and toll plaza in this area. A landscaped, linear park above the corridor would create a pleasant space for residents along Bremen Street, eliminating view of toll plaza in an attractive manner, while tying two neighborhoods together.

2. Alternative 3 --

South Bay/Fort Point Channel -Comments same as Alternative 2.

Jeffries Cove

Again, more design information is needed for the ventilation building. The walls and landscaping used to screen the toll plaza should be described in more detail.

Secretary James S. Moyce

- 7 -

March 16, 1982

3. Alternative 4 --

South Bay - Comments same as Alternative 2.

Fort Point Channel

The visual impact of two ramps above water and further reduction of the channel width due to the two-way traffic system will be increased slightly but is generally the same as Alternative 2.

East Boston - Comments same as Alternative 2.

4. Alternative 5 --

South Bay - Comments same as Alternative 2.

Fort Point Channel - Comments same as Alternative 4.

Jeffries Cove - Comments same as Alternative 3.

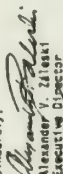
5. Urban Design and Joint Development Opportunities --

Option 2 has many urban design concepts which minimize visual impacts of the tunnel and roadway extensions. Could some of these ideas be modified/ integrated into the base design? Further information concerning the funding constraints with regard to the Option 2 amenities should be provided.

In addition to the staff comments above, WAPC solicited review comments on the DEIS from the entire membership of the Council. This was considered appropriate given the magnitude of the project. Responses were received from 36 WAPC representatives and are attached to this letter for your review.

The Council thanks you for the opportunity to comment on this project.

Sincerely,


Alexander H. Zilless
Executive Director

AVZ/DL/14b

Attachments

cc: Mr. Norman J. Van Ness, FIMA
Mr. William Frederick P. Salvucci, EOTC
Commissioner Robert T. Tierney, NRPW
WAPC Representatives

RESPONSE TO COMMENTS BY THE METROPOLITAN AREA PLANNING COUNCIL (March 16, 1981)

75. MAPC has misinterpreted the text on the traffic analysis when referring to traffic volume changes at Bell Circle. The DEIS/FEIR indicates on page 112 that Average Weekday Daily Traffic (AWDT) will increase on Route 1A by approximately 30 percent between 1982 and 2010 (i.e., about 1 percent per year), with or without a Third Harbor Tunnel. During peak hours, traffic volumes at Bell Circle will increase by 20 to 25 percent without the project (No-Build Alternative) during this same period (page 122). With a Third Harbor Tunnel, the peak hour volumes at Bell Circle will increase by about 5 to 8 percent over the No-Build Alternative. The traffic impact analysis reflects this increase in traffic volumes.

76. Section 1.2 of the FEIS/FEIR identifies existing and future proposed land uses in the project area. These known proposals were used in the modeling.

77. The SDEIS/SDEIR which has been prepared to effect improvements in traffic operations evaluates major Central Artery improvements. The Preferred Alternative includes both depressing and widening the Central Artery and a Third Harbor Tunnel.

78. Based on studies by the Federal Highway Administration, accident rates tend to be highest at very low speeds, lowest at average speeds, and increase again at very high speeds (see "Transportation and Traffic Engineering Handbook", ITE, Second Edition). The speeds projected for the future highway network fall within the "average speed" category.

The severity of future accidents is not expected to be increased, and will likely be less than the existing rate of severe accidents owing to the improved geometrics and standard safety features incorporated into current design standards. See Section 4.2.7, Safety, in the FEIS/FEIR.

79. Losses/reductions in parking are addressed in Section 4.2.10 Parking Impacts.

80. The effectiveness of each Third Harbor Tunnel build alternative in reducing these queues can be easily compared with the No-Build Alternative in Table 77 in the SDEIS/SDEIR. The queuing diagrams were replaced by tabular comparisons in the SDEIS/SDEIR and FEIS/FEIR, and diagrammatic maps of the highway network in Appendix 3 of the FEIS/FEIR.

81. The alignments which would affect the Bubblegum Factory building in East Boston are no longer being considered.

82. As stated in the Conceptual Relocation Plan Report (Appendix 2), relocation benefits and other possible sources of aid are available for affected businesses. An appeals process exists for those businesses which are denied payment or wish to dispute the computed amount. Whether or not the benefits are sufficient for affected businesses is a factor of each business' individual circumstance; the appeals process is available to adjudicate possible disagreements regarding the amount of benefit.

83. Specific mitigating measures are described in Section 4.4 LAND USE. Some of these measures, however, such as the enforcement of traffic and parking regulations, may require cooperation by the City.

84. The FEIS/FEIR discusses regional impacts in Section 4.4 LAND USE.

85. Alternatives affecting these receptors in East Boston have been rejected; see Section 4.8.2 Vibration.

86. The noise barriers at Rottch playground are not likely to be built; See Section 4.8.1 for a discussion of the likely noise barriers. These barriers are also discussed in Section 4.16 AESTHETIC IMPACTS.

87. See response to Comment Number 81.

88. Alternatives 2 and 4 are no longer being considered in this study. Both long- and short-term direct and secondary impacts to the neighborhoods have been evaluated in the FEIS/FEIR (see Section 4.5).

89. Business relocations will affect the employment of some workers either through the inability of the business to relocate or the worker's inability to commute to a new location. (The BOPC/MDPW will take extraordinary measures to relocate displaced businesses.) The economic and social effects of possible relocations are discussed in the FEIS/FEIR, Section 4.3 RELOCATION IMPACTS.

90. The use of silt curtains has been included as a mitigation measure during construction. This is particularly relevant in Fort Point Channel, where loading of barges with excavated materials could result in some leakage of turbid water. The application of silt curtains in the Harbor itself to contain the turbidity plume is not appropriate because of the depth of water involved. As described in the FEIS/FEIR, dredging for the Preferred Alternative will require considerably less time, and therefore the exposure period for marine life will be shorter. A water quality monitoring program is planned during construction to control impacts of the dredging operations.

Clamsnell dredging will be utilized for excavation of marine sediments for the sunken tugs across the Harbor. Hydraulic dredging has been rejected, as discussed in Section 4.1 of the FEIS/FEIR.

91. Odors will be produced from dredging of surface marine sediments. Within the Fort Point Channel, the dominant odor will be that of petroleum fractions which are present in the sediment. Within Boston Harbor and across Jeffries Cove, sulfide odors will dominate. For old sediments to be excavated in South Boston under the Central Artery and Logan Airport for the Preferred Alternative, sulfide odors will also dominate. Prevailing winds will disperse the odors generally southwest and northwest (depending on month). Odor generation will be most intense when surface sediments are being dredged. No odors should result from dredging of clays or till.

Since the volume of contaminated marine sediments for all alternatives is less than 10 percent of the total, the odors will only be generated for a similar period of time. If there are particularly lengthy periods when odors are expected to be produced, the intensity can be reduced considerably by the application of lime to the soils. Odor impacts are discussed in Section 4.9 WATER RESOURCES.

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Robert J. Ryan, Director

March 18, 1983

Secretary James Hoyte
Executive Office of
Environmental Affairs
100 Cambridge Street
Boston, MA 02202

ATTENTION MEPA UNIT

Dear Mr. Hoyt:

Re: EOE #4125: Third Harbor Tunnel Draft EIS/EIR - Boston

Pursuant to regulations implementing the National Environmental Policy Act of 1969 (42 USC 4332) and M.G.L., Chapter 30, Sections 62-62M, the Boston Redevelopment Authority has reviewed the above referenced DEIS/EIR and submits the following comments.

In general, we have found the Third Harbor Tunnel DEIS/EIR to be a very comprehensive analysis of the environmental benefits and adversities of the project. There remain, nonetheless, several areas of the report requiring further analysis or clarification, as will be discussed below. However, the primary issue is not whether the impacts have been adequately described, but whether the potential benefits of the project outweigh the adverse effects on the surrounding communities.

It appears that the project would have major traffic benefits in the downtown Boston area and in the existing tunnels and Mystic/Tobin Bridge. However, significant adverse physical, social, and economic impacts would be realized in several areas. Nearly 50% of the Port Boston Channel would be lost to the city. This would result in a significant loss of port capacity and a consequent loss of jobs. The alignment would result in significant visual degradation, depressed land values, reduced development potential, and delays in the important Rose/Foster wharf development. The loss of Boston's significant economic benefit potential for the City, particularly in the area of the Port Boston Channel, is a major concern. The EIS/EIR that the development potential in the Port Point Channel area (as well as the South End, South Boston and elsewhere) would be under the no-build then under build conditions are questionable and not necessarily based on improved airport access.

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Boston, Massachusetts 02201
(617) 722-4300

The East Boston community also would be significantly affected by Alternatives 2 and 4 which propose a roadway within the railroad alignment parallel to the existing I-93 and the I-93 and I-495 interchange, and the I-93 and I-495 interchange, and the I-93 and I-495 interchange. Increased noise levels, visual impacts, and reduced development potential would result. Adverse secondary economic impacts would result from visual degradation and from severing the community. Traffic on Route 1A in East Boston also would increase approximately 35% under these options.

The second crucial question to be asked concerning the Third Harbor Crossing is whether other arguments than those proposed, as well as significant improvements to the Central Artery, would realize some of the same traffic benefits without the extensive adverse effects. Other than the No-Build alternative, which would realize no benefits, the other alternatives such as the Central Artery, the Harbor Tunnel, and the Harbor Bridge, all include the potential for realizing some of the same benefits as the proposed Third Harbor Crossing. The Harbor Bridge alternative includes the potential for other major roadway improvements with or without the tunnel. The Third Harbor Tunnel cannot be looked at in isolation from the needed improvement of the overall canal area circulation system. We believe that alternatives must be developed and evaluated that do not dramatically increase the use of the Harbor Tunnel. Major improvements to the Harbor Bridge and which include other major roadway improvements as solutions to the Harbor Bridge traffic problems, such as the reconstruction and/or depression of the Central Artery and construction of a Seaport Access Road. We also feel that the Boston Redevelopment Authority, as well as the residents of the affected areas, must be involved in the development and selection of these alternatives.

The following describes specific areas of the DEIS/EIR that we believe require further analysis or clarification:

- (1) The factors considered in deriving background levels of CO for the years 1982, 1990, and 2010 should be explained (p. 74).
- (2) A comparison of air quality benefits between the proposed tunnel alignments and a Central Artery Improvements alternative should be made (p. 74).
- (3) The text discussion on tail pipe emissions (p. 210) and tunnel ventilation emissions (pp. 210-211) is misleading. Table 41 indicates the contribution of traffic at the toll plaza to the 1-hour CO and 1-hour NO₂ levels. It does not show the total concentration of these pollutants at the receptor sites.
- (4) The main EIS/ER document should include the receptor location and monitoring location maps provided in the Air Quality Appendix in order to facilitate reading of the data in the text.
- (5) It is stated in the EIS/ER that improved vehicular access to Logan's Airport will induce traffic to the airport and consequently is liable for parking at the airport. However, this statement ignores the fact that Logan is under a Federally-mandated parking freeze and that parking cannot automatically be increased.
- (6) The EIS/ER indicates that no residential relocations will be necessary for the proposed tunnel. However, the tunnel will be adverse to the noise and visual impacts and impacts on neighborhood boundaries certain

31/031843

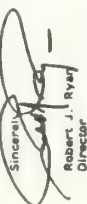
residences may become undesirable and relocation would be a secondary priority. At this time, no adverse impacts are most severe, property values would be adversely affected, and it is economically infeasible for persons, particularly the elderly, to move. What provisions would be made for persons affected by these conditions?

(7) In terms of water quality the construction period, although temporary, will be extensive and potentially significantly harmful to marine life. Construction should be limited to the minimum necessary to implement the mitigation measure. Monitoring of water intake locations and the harbor area should be made in order that silt reduction measures can be implemented if necessary to minimize impacts on users.

(8) The list of "Other Federal Actions" (p. viii of Summary) fails to include a discussion of the proposed Office of Coastal Zone Management. Since this proposal is located within the Coastal Zone, a determination of consistency pursuant to the Federal Coastal Zone Management Act would be required.

As indicated above, one of our primary concerns is the visual impact of the construction on property values and development potential. Most of the appropriate mitigation measures for the proposed project are referred to in the EIS/EIR as Option 2, or project enhancement features not eligible under current interstate funding. Therefore, these measures are least likely to be implemented, and thus little mitigation of visual impacts would result. In addition, the pedestrian walkway along the Fort Point Channel, offered as a visual mitigation measure (p. 283), would further reduce the width of the Channel and in itself could thus have an adverse effect.

We appreciate the opportunity to review the DEIS/EIR and trust that our comments will be seriously considered by the FHWA and the Massachusetts DPW in the preparation of the final document.

Sincerely,

 Robert J. Rydal
 Director

cc: Kevin M. White, Mayor, City of Boston
 Mr. Justin L. Radlow, P.E., Chief Engineer, Mass DPW

61/031683

RESPONSE TO COMMENTS BY THE BOSTON REDEVELOPMENT AUTHORITY (March 18, 1983)

94. The basis for developing the 1-hour and 8-hour CO background levels are described in an appendix to the DEIS/DEIR (Appendix 5: Air Quality).

95. The air quality effects for alternatives with just a Third Harbor Tunnel and alternatives with just Central Artery Depression are both described in detail in the DEIS/DEIR.

96. Total impact from all sources with respect to 1-hour and 8-hour CO is given in Tables 39 and 40 of the DEIS/DEIR. Table 41 focuses only on that component which is attributed to toll plaza emissions. Comparing Table 41 (toll plaza effects) to Table 45 (ventilation building effects), it is evident that with a new Third Harbor Tunnel, impact on 1-hour NO₂ from toll plazas will be very insignificant relative to impact from the ventilation buildings.

97. These maps are included in the FEIS/FEIR (see Figure 57).

98. Effects of increased parking demand at Logan are addressed in Section 4.4 LAND USE. A program to review the impact of zoning and other land use control mechanisms (including various de facto licensing by Massport of off-airport industrial uses) will be undertaken immediately as one element of a total program to control airport growth; it will be performed as an integral element of the Preferred Alternative. Lifting the EPA ban on increasing on-airport parking is being pursued by the Commonwealth and Massport.

99. The effects described in this comment would occur under Alternatives 2 and 4, the railroad alignments through East Boston; these alternatives have been dropped from further consideration precisely because of the extent of the adverse impacts likely to occur in the East Boston neighborhood.

100. See previous responses to comments by the Metropolitan Area Planning Council (MAPC), and the U.S. Public Health Service. A water quality monitoring program will be undertaken during the construction/dredging activities of the Third Harbor Tunnel project, including intakes of industrial water users in the area of impact. Use of silt curtains to confine the plume generated by dredging is appropriate as a mitigation measure in the Fort Point Channel but not in the Harbor because of the water depth (see Section 4.9 WATER RESOURCES).

101. A consistency finding in accordance with the Coastal Zone Management Act has been received from the Massachusetts Coastal Zone Management Office. See COMMENTS AND COORDINATION.

Boston Water and
Sewer Commission

12 Post Office Square
Boston, MA 02109
617-424-4044

April 6, 1983

James S. Hoyne, Secretary
Executive Office of Environmental Affairs
20th Floor
100 Cambridge Street
Boston, MA 02102

Attn: NEPA Unit

Re: Third Harbor Tunnel Project, I-90
Draft EIS/EIR

Dear Mr. Hoyne:

The Boston Water and Sewer Commission (BWSC) has reviewed the Draft EIS/EIR and Supportive Engineering Report for the Third Harbor Tunnel Project. During development of the report, a representative from our agency sat on the Interagency Committee and several meetings were held in our office with members of the H-F-W consultant team to specifically discuss the impact of the tunnel alternatives on BSC facilities. Our comments are included in the draft EIS/EIR. We have also reviewed the proposed relocations of the New East Side and New Boston Main Interceptors and extensions of combined sewer overflows to Fort Point Channel.

Section 4.14 of the Draft EIS/EIR lists the BSC facilities impacted by the tunnel alternatives. Relocations and extensions necessary are shown in plan view in Figures 66 to 71 of the Supportive Report and explained in the text. We agree with the findings of the draft EIS/EIR and would like that conclusion still stands regarding the timing and character of the Commission's proposed new interceptors. From the information provided, we cannot determine whether the relocations shown in the report are hydraulically feasible. We encourage the U.S. Department of Transportation and Massachusetts Department of Public Works to involve us early in design of the selected alternative. Extension of the existing combined sewer main to the New East Side and New Boston Main Interceptors and the combined sewer main is a concern to the Commission with respect to physical feasibility and water quality effects. Neither of these concerns were resolved during meetings with the consultants and are not mentioned in the Draft EIS/EIR.

James S. Hoyne
Page 2
April 6, 1983

Again, profiles of the proposed extensions should be sent to the BSC when they are developed. We also recommend that mention of these outfalls be included in the water resources section (4.8) of the EIS/EIR.

Thank you for the opportunity to comment. We hope to continue coordination with your agencies as the project proceeds.

Yours truly,

Charles S. Brown
Charles Brown, P.E.
Chief Engineer

CS/mo

cc: Norman J. Vardans, RMA
Justin L. Radlo, RMA

RESPONSE TO COMMENTS BY THE BOSTON WATER AND SEWER COMMISSION (April 6, 1983)

102. Several meetings were attended with the BWSC to discuss their proposed interceptors in the vicinity of Fort Point Channel and the impact of the tunnel construction on their existing and proposed facilities. Since definitive plans were not always available for the BWSC proposals, owing to funding constraints, certain assumptions were made to develop feasible utility relocations. The Massachusetts Department of Public Works will involve the BWSC during the design phase to assure that the concerns of the BWSC are addressed by the project.

Effects of the reduced water volume of the Fort Point Channel on water quality are minimal, as discussed in Section 4.9 WATER RESOURCES.

Greater Boston
Commerce
135 Fifth Street
Boston, MA 02110
Tel: 257-1250

Kenneth R. Rossano
Chairman

March 4, 1983

Mr. Justin D. Reale, P.E.
Chief Engineer
Massachusetts Department of Public Works
100 Nubius Street
Boston, MA 02114

Dear Mr. Reale:

In accordance with Chapter 10, Section 62 - 62N of the Massachusetts General Law and Sections 6.1, 6.2, and Appendix 3 of the Regulations of the Executive Office of Environmental Affairs, the Greater Boston Chamber of Commerce submits the following comments regarding the "Boston - Interstate Route 90 - Third Harbor Tunnel" project.

The Greater Boston Chamber of Commerce has thoroughly reviewed the Draft Environmental Impact Statement (E.I.S.), and considers that a substantive professional analysis was done by the consulting firms of Howard Needles Tammen & Bergendoff, Inc., Spofford & Normande, Inc., C.E. Taggart, Inc., and Wallace, Froyd, Associates, Inc.

On Monday, February 28, 1983, the Board of Directors of the Greater Boston Chamber of Commerce voted unanimously to support the construction of a Third Harbor Tunnel as a necessity for relieving traffic congestion in the greater Boston area and to improve access to Logan International Airport.

As the E.I.S. clearly delineates, without the construction of a Third Harbor Tunnel, "the Callahan/Sumner Tunnels . . . at-capacity or forced-flow conditions . . . will increase from five hours each commuting weekday in 1982 to 14 hours (generally 6 AM to 8 PM) in 2010" (page 19). In addition, the E.I.S. states that without the construction of a Third Harbor Tunnel, "traffic congestion and delays will be increased from 14 hours (in 2010) without a Third Harbor Tunnel to only one or two hours of the day, depending upon the alternative" (page 19).

The Board of Directors of the Chamber generally favor the adoption of Alternative 1, the new-way tunnel, in the Point Channel, connecting with Route 1A in Logan, and with Route 1A in East Boston. In addition, Option 2, which provides several mitigating measures for the East Boston community should be adopted. Several of the Central Artery modifications (discussed on pages 162 - 170 of the E.I.S.) should be adopted.


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The need for the construction of a Third Harbor Tunnel for the greater Boston area is unassailable when viewed in the light of the commuting public and the economic benefits to be derived. The E.I.S. additionally demonstrates that the proposed construction of a Third Harbor Tunnel is environmentally sound.

I am enclosing with these comments a listing of the Officers and Directors of the Chamber, and a copy of the listing of our 1000 member corporations. I am sure you will be of further service to you, please contact me.

Sincerely,


Kenneth R. Rossano
Chairman

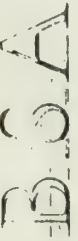
Enclosure

cc: His Excellency Michael S. Dukakis
Governor of the Commonwealth of Massachusetts

Frederick P. Salvucci
Secretary of the Executive Office -
Transportation & Construction

RESPONSE TO COMMENTS BY THE GREATER BOSTON CHAMBER OF COMMERCE (March 4, 1983)

103. Subsequent to publication of the DEIS/DEIR in December 1982, an SDEIS/SDER was published in June 1983. The SDEIS/SDER addressed the impacts of alternatives which depress and widen the Central Artery; in two instances these alternatives were coupled with cross-harbor tunnel alternatives to Logan Airport and Route 1A, while one alternative did not provide the increased cross-harbor capacity of a Third Harbor Tunnel. Third Harbor Tunnel alternatives which utilized the railroad right-of-way in East Boston (Alternatives 2 and 4), though less expensive in terms of capital cost, had the potential to significantly disrupt the East Boston community and were therefore rejected by the Executive Office of Transportation and Construction and the Massachusetts Department of Public Works from further consideration in March 1983.



A. Anthony Toppo, FALLA

Mr. Justin L. Radlo, Chief Engineer
Central Artery Section
Massachusetts Department of Public Works
100 Nashua Street
Boston, Massachusetts 02114

Dear Mr. Radio:

The Boston Society of Architects is pleased to submit its comments on the Draft Environmental Impact Statement/Report for the Third Harbor Tunnel Project and has welcomed the opportunity to participate in the public review process of the Working Committee over the past year.

The importance of the impacts of this proposed project are complex, far-reaching, and varied. Consequently, to make our comments most useful, we have focused on those impacts of most concern to us and on those impacts about which we are most expert: namely land development and visual impacts.

Through the Third Harbor Tunnel project is primarily conceived as a transportation facility, it should in fact be equally evaluated as a major urban regeneration project. The project can create such a major urban regeneration project in the financial district and through East Boston, as such, it can create many opportunities, as well as lifelines, for stimulating development, creating new jobs, providing recreation space, reconnecting the City to its historic waterfront, and revitalizing a neighborhood torn by rail lines. The project provides an opportunity for the City to provide the urban transportation infrastructure that is needed to make the City a more livable and economically vibrant place. The project should be considered worthy of funding. Many cities throughout the United States and throughout the world are wrestling with what to do with highways previously built through their centers which have only served as an environmental barrier to urban development. The Third Harbor Tunnel project in Boston must not become such a deterrent.

As a transportation facility, the merits of the four proposed build alternatives are difficult to judge as whether any one of them is the best solution for downtown Boston's traffic congestion problems. This is due to the fact that, as we stated previously during the scoping sessions, the range of alternatives studied in this EIS/EA are too limited. We believe that some of the thirteen alternatives (including the Central Artery) which were eliminated earlier in the Corridor Planning Study (CPS) should have been reviewed for a more thorough examination.

The Boston Society of Architects

A Chapter of
the American Institute
of Architects

02010607 Simon
Bureau of Economic Warfare 02119
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The Boston Society of Architects

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March 16, 1983

OFFICE OF THE SECRETARY
OF ENVIRONMENTAL AFFAIRS

Mr. Justin L. Radio, Chief Engineer
Central Artery Section
Massachusetts Department of Public Works

Additionally, the suggestion during the course of this study that the institution of one-way tolls or elimination of the tolls entirely at the Summer and Callahan tunnels be considered as an alternative was not evaluated adequately. Its dismissal as a viable option or at least a partial solution in the draft EIS/R is unconvincing.

In summary, though the EIS/R indicates that traffic flows through the existing tunnels would greatly benefit by the construction of a Third Harbor Tunnel, the EIS/R also indicates that traffic flows would be simultaneously increased on other major highway links such as the Nassi Turnpike. The project's transportation benefits are therefore not clear cut. Particularly in light of the fact that major alternatives were not examined.

As stated earlier, however, our primary concern is with the land-use and visual impacts of this project.

In the Fort Point Channel area, both to the north and south, major development is about to begin. This is due to the north and south development boom in downtown Boston and in part to the potential for increased commercial and recreational use of the Channel. Visual and pedestrian access to the harbor and Fort Point Channel, as provided by the City, is being increased. The City is trying to increase visual and pedestrian access to the water's edge as a matter of policy. It should be noted that the active development of the harbor area is not the only reason for the desire for more of a Fort Point tunnel (though other local transportation access improvements are desired).

[illegible]

Many of these negative visual impacts could be reduced, it would seem, if relocated Dorchester Avenue and the ramps were removed from the plan. From a traffic point of view, it is unclear whether direct road connections to the tunnel at Summer Street are needed from the lower Financial District.

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As a transportation facility, the merits of the four proposed built alternatives are difficult to judge as whether any one of them is the best solution or downtown location a traffic congestion problem. This is due to the fact that, as stated previously during the scoping sessions, the range of alternatives studied in this EIS/R are too limited. We believe that some of the thirteen alternatives (including the General Alterly) which were eliminated earlier in the Corridor Planning Study (CPS) should have been reviewed for a more thorough examination.

The Boston Society of Architects

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The Boston Society of Architects

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RESPONSE TO COMMENTS BY THE BOSTON SOCIETY OF ARCHITECTS (March 14, 1983)

104. As a result of extensive public comments received during the comment period after publication of the DEIS/DEIR, Alternatives 2 and 4 (Railroad Alignments) were rejected from further consideration. Also, three alternatives which improve operating conditions on the Central Artery were added to the study and were fully evaluated in the SDEIS/SDEIR.

105. The DEIS/DEIR did not reject the concept of one-way tolls. The study performed in the DEIS/DEIR was specifically not intended to be used to determine the desirability of alternative toll collection practices. The analysis indicated that harbor-crossing circulation patterns would not be significantly affected with alternative toll collection strategies. Since one-way tolls have become permanent, the toll facilities of the proposed Third Harbor Tunnel in the Preferred Alternative will be consistent with that decision.

106. The traffic analysis of Alternative 5A in the SDEIS/SDEIR indicated unacceptable traffic operating conditions and economic impacts on the Boston CBD because of the reduced vehicular access to the area. These results revealed that Relocated Dorchester Avenue provides necessary access to the area and is an integral element of the transportation improvement program. The Preferred Alternative includes this roadway. The ramps crossing the Port Point Channel are not included in the Preferred Alternative.

107. The urban design measures referred to as Option 2 are not presently eligible for interstate funding; other funding sources (federal, state, local and private) are necessary for their implementation. Section 4.4.4 in the DEIS/DEIR identifies the elements included in the project.



A. Anthony Tappin, F.A.S.A.
President

Traffic originating in the downtown area and destined for the Airport could still use the existing Summer and Cambridge Streets. Therefore, if these connections were considered only marginally beneficial, the ramp and relocated Dorchester Avenue could be eliminated, thereby removing two of the major roadway elements that cause the greatest negative environmental impacts in the Channel area.

At the very least, if any of the build alternatives are considered viable, the pedestrian amenities suggested by Option 2 must be included in the construction budget if the Channel area is to retain any semblance of a pleasant, pedestrian environment.

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In East Boston, Alternatives 2 and 4 (the railroad alignment) are potentially the most desirable. Yet, at the same time, they provide the opportunity to reinitiate this neighborhood now torn by an open cut rail right-of-way. These alternatives should only be considered if all parks, decking and landscaping proposed in Option 2 are included in the construction budget. Without the covering and decking of the open railroad cut and toll plaza proposed for in Option 2, the East Boston neighborhood would only be a transit corridor. The toll plaza should be eliminated and replaced with a greater barrier than now exists across the neighborhood.

Again we are pleased to have the opportunity to offer our comments. If you have any questions please do not hesitate to contact me.

Sincerely,

A. Anthony Tappin
A. Anthony Tappin, F.A.S.A.
President
Boston Society of Architects

cc: Secretary James S. Boyce
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts

AAT/esp

The Boston Society of Architects

120 Newbury Street
Boston, Massachusetts 02116
Telephone 617-552-1111
FAX 617-552-1112

A. Anthony Tappin
President

BOSTON WHARF CO.

REARVIEW STREET, 434
INDUSTRIAL REAL ESTATE
BOSTON, MASSACHUSETTS 02101

010-0030

also tunnel street

March 21, 1983

Justin L. Radlo, P.E.
Chief Engineer
Massachusetts Department of
Public Works
100 Washington Street
Room 330
Boston, MA 02116

Dear Sir:

For the record, we are submitting the following comments on the Draft Environmental Impact Statement/Report, Third Harbor Tunnel Project, submitted to the Massachusetts Department of Public Works for review and addressing our concerns as summarized herein.

1. PROPOSED TUNNEL CONCEPT:

We do not disagree that a third harbor crossing is in the best interests of the State and the City of Boston. However, in reviewing the DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT, we find that if any of the four Building Alternatives are constructed, our ability to maintain the current use of our property, and to realize our future development goals, will be adversely impacted over both the short and long term.

All of the Build Alternatives will give our property more direct access to the waterfront than we currently have, which will undoubtedly be useful to us now and in the future. However, we believe that the DRAFT EIS/R suggests, improved airport access will not be "irrevocably decisive to the area's (Fort Point Channel Area) future."

Since improved access to the airport and the North Dore is not critical to our current needs or to our future development plans, we consider that the adverse impacts which will be imposed upon our properties in the Fort Point Channel Area under any of the Build Alternatives will never be mitigated by the construction of tunnel as proposed.

2. PROPOSED ALIGNMENTS AND TRAFFIC:

The purpose of a third harbor crossing as proposed by the DRAFT EIS/R, is as we understand it, to improve access to the airport

March 21, 1983
Page -2-

by relieving traffic congestion on the current airport access roads. We are concerned that the proposed Third Harbor Tunnel, Route 1A on the North Shore with the Massachusetts Turnpike and the Southwast Expressway. Traffic congestion on local streets is not expected to improve under the Build Alternatives significantly, or at all.

We feel, however, that this scope of purpose is too limited, since it makes little attempt to improve the level of service on local streets. The DRAFT EIS/R indicates that under the No-Build Alternative, traffic congestion on the local streets of South Boston is expected to moderately increase, but these streets currently have among the lowest levels of service (either of F) under all Build Alternatives. The level of service is expected to increase to E or F, but it is not expected to improve under any of the Build Alternatives.

It is possible, however, to broaden the scope of purpose of the proposal to include efforts at relieving traffic congestion in the Fort Point Channel Area. Traffic congestion in the Fort Point Channel and Boston Harbor area of South Boston.

This can be accomplished by integrating the Third Harbor Crossing plan with the current proposals to develop a seaport access road network.

Integration of the two proposals can be done with some adjustments in access road and canal alignments and by relocating the tunnel from Fort Point Channel to underground construction on the East side of Fort Point Channel. Neither East Boston Alignment need change.

Such alignment adjustments to incorporate seaport access road network will better serve our transportation needs, as well as others in the area, while eliminating many of the adverse impacts which we and others will be forced to make objections to, under all Build Alternatives.

In addition, since access to our property from Boston across Fort Point Channel is currently impeded by the existing Northern Avenue Bridge, we support the FMA/DMP Northern Avenue Bridge Replacement Project. We therefore object to any proposals for the Third Harbor Tunnel crossing that would require the relocation of the bridge. We object to proposals for construction of an intersection between New Dorchester Avenue and New Northern Avenue, since they will undoubtedly delay the design and construction schedule of the new bridge.

We are also concerned that the DRAFT EIS/R, in establishing an intersection at Dorchester Avenue and Northern Avenue have not adequately addressed the effect that this additional intersection

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will have on the bridge traffic flow, particularly when account-
ant for the amount of new traffic that will be generated by
the substantial land development anticipated in South Boston,
including our development plans, BPSOON, the Airport Access
Plan, the Harbor Crossing Plan, the Harbor Access Plan, the
Harbor Projects, and EDC Projects.

If the Third Harbor Crossing proposal is integrated with the
plans for the Airport Access Road Network, the New Dorchester
Avenue - New Northern Avenue intersection, will not be necessary.

3. LAND USE AND ECONOMIC IMPACTS:

The DRAFT EIS/A indicates that under all build alternatives, our
property fronting on the Fort Point Channel will lose up to
90 percent of its total value under the current zoning. But
if the property is changed, the economic impacts
will be insignificant.

We agree that we will suffer an economic loss under all build
alternatives at the levels indicated by the DRAFT EIS/A on our
property fronting the Channel, and are concerned that no pro-
vision has been proposed to compensate us for that loss.

We do not agree that this loss would be insignificant if the
zoning of the property was changed. This property is our only
property with direct frontage on, and access to the waterfront.
It is this relationship which puts a premium on its value and
gives it a unique character. Under our current zoning, water-
related activities in our overall development plans, an
opportunity which has significant economic value that we will
be deprived of under all of the Build Alternatives. Whether
or not a zoning change is sought by us and granted by the City
will not alter the negative economic impact.

4. NOISE AND VIBRATION:

We notice that in the Noise and Vibration section of the DRAFT
EIS/A a series of noise barriers ranging from 10 to 15 feet in
height are proposed to be built along New Dorchester Avenue,
between the intersection of New Dorchester Avenue and Congress
Street and the New Northern Avenue Bridge.

We believe that should such noise barriers be built, the negative
visual impacts on the Channel will be irreparable.

5. VISUAL IMPACTS:

We agree with the DRAFT EIS/A that the visual character of
the Fort Point Channel under all Build Alternatives will be
affected, but we feel that the position is understated.

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We believe that the visual quality of the Channel will be
diminished to such an extent with the introduction of the New
Dorchester Avenue and the tunnel access ramps from Summer
Street, that all measures as proposed to soften these impacts
will not sufficiently mitigate the problem.

We are distressed that some of the more appealing measures
suggested to soften the edge of the New Dorchester Avenue
(Option Two) are not fundable under the Interstates findings,
currently being sought for the proposed tunnel and wonder
why this option is included, if its realization depends on
an uncertain funding consideration!

We are also distressed to find that no efforts have been
proposed to mitigate the adverse visual impacts which the
tunnel access ramps from Summer Street under all of the Build
Alternatives will have on our property.

6. CONSTRUCTION IMPACTS:

We expect that much of our development timetable will coincide
with the proposed timetable for construction of the tunnel.
In addition, the FMAA/CDP Northern Avenue Bridge Replacement
Project is expected to be nearing completion. Just as the
proposed tunnel construction is being initiated, as a result,
we will be subjected to nearly a decade-long period of increased
access, potential utility interruptions, construction noise and
vibration and other construction related inconveniences.

These interruptions, in spite of proposed mitigating measures,
will severely affect our development schedule and limit our
ability to successfully complete in the marketing of our anticipated
development projects.

We are also concerned that we will have difficulty maintaining
our current tenants and attracting new ones to occupy our
existing buildings for the above reasons.

Our property includes seventy-four buildings, most of which are
old and historic structures, and which lie in close proximity
to the Channel. We are therefore concerned about potential
structural damage to, and soiling of building facades, which may
be caused by vibration, air pollution and air-borne dirt during the
construction activities, in spite of proposed mitigating
measures.

We find no provision in the DRAFT EIS/A to compensate property
owners for building repair and cleaning necessitated, should the
above construction damage occur.

We look forward to receiving your responses to our concerns.

Respectfully,

Robert N. Manney
Robert N. Manney
General Manager

RMC:jn

RESPONSE TO COMMENTS BY THE BOSTON WHARF COMPANY (March 21, 1983)

108, 109. As suggested in the Boston Wharf Company's letter, the scope of improvements evaluated was expanded to address major improvements to the Central Artery and improved highway access to the seaport area of South Boston. Many of the concerns of Boston Wharf Company have therefore been addressed in the SDIS/DEIR by evaluation of Alternative 5A. Further analysis and refinement of that concept is presented in the FEIS/FEIR for the Preferred Alternative.

The Third Harbor Tunnel/Central Artery project will not impede construction of the Northern Avenue Bridge Replacement Project. As presented in the FEIS/FEIR, relocated Dorchester Avenue will not intersect with Northern Avenue, and the northbound Central Artery Tunnel does not pass beneath the Bridge.

The Preferred Alternative, as evaluated in the FEIS/FEIR, includes a relocated Dorchester Avenue as far north as Congress Street. No intersection with Northern Avenue is proposed.

110. The impacts on Boston Wharf Company property of the Preferred Alternative is significantly different from that described in the DEIS/DEIR; see Section 4.4 LAND USE.

111. The barrier of concern to the Boston Wharf Co. is not included in the Preferred Alternative.

112. Option 2 design measures were discussed in the DEIS/DEIR in order to suggest potential mitigation measures for which other forms of funding may be pursued. Section 4.4.4 in the FEIS/FEIR discusses the urban design measures to be included in the project. The impacts of the Preferred Alternative on Fort Point Channel are significantly less than those of the alternatives shown in the DEIS/DEIR.

113. While there will be unavoidable inconveniences from construction of the project, every effort will be made to minimize these effects. Utility interruptions will occur briefly while utilities are relocated; extensive coordination with utility owners and those affected by the construction will be required to ensure that these disruptions are minimized. No bridges will be closed.

The results presented in the DEIS/DEIR do not indicate the potential for "structural damage" to any buildings within the Boston Wharf Company Warehouse District. The results do indicate that the very conservative vibration criterion for "architectural damage" (e.g., very fine plaster cracks) could be exceeded at five buildings in this district during periods of nearby project pile driving operations. Techniques for mitigating such vibration during construction will be further investigated during final design. See Section 4.8.2 Vibration.

RECEIVED

The Gillette Company
Environmental Affairs
Boston, Massachusetts 02109
(617) 437-7800

OFFICE OF THE SECRETARY
OF ENVIRONMENTAL AFFAIRS

John B. Gault
Secretary
Office of the Governor
March 21, 1983

Secretary James S. Hoyte
Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

Dear Secretary Hoyte:

We have examined the Draft Environmental Statement/Report ("Draft Report") for the proposed third harbor tunnel to the Fort Point Channel. We submit the following comments on the Draft Report, which contains two factual inaccuracies in the Draft Report which combine to significantly underestimate the impact that a third harbor tunnel would have on The Gillette Company's South Boston manufacturing facility.

The Draft Report incorrectly states at page 233 that Gillette's maximum daily usage of the Fort Point Channel is 125,000 gallons per minute (1.3 million gallons per day). This figure represents only current normal summer usage. In a report prepared for Gillette by Camp Dresser & McKee, Inc., and submitted to HPW under cover letter dated August 10, 1982, our water requirements from the Fort Point Channel were listed at 1,000,000 gallons per minute (10 million gallons per day). This quantity represents Gillette's maximum daily usage. This quantity has been judged to be a reasonable stated capacity for Gillette's existing intake systems.

Our second concern with the Draft Report is the proposed extension of the existing 650 foot intake tunnel to the area just beyond the existing intake tunnel. The Draft Report states that such an extension would meet the needs of Gillette and possibly improve water quality in the Fort Point Channel. To the contrary, we believe strongly that the proposed 3,700 foot extension to the intake tunnel will create major problems for the Gillette manufacturing operation. Specifically, these problems are capacity, operational maintenance, and safety.

Secretary James S. Hoyte
Page Two
March 21, 1983

The addition of a 3,700 foot extension would necessitate that Gillette powerhouse operating personnel travel by vehicle to the new location to conduct our yearly tunnel spring cleaning operation. The existing 650 foot intake tunnel requires annual cleaning during a three-day plant shutdown with a total cost to Gillette of between 15-20 thousand dollars. Assuming that Gillette will be able to locate the extended tunnel, the annual cleaning operation for the extended tunnel would require additional plant shutdown time and increase Gillette's annual maintenance costs exponentially. The Draft Report does not sufficiently identify these problems and as a result fails to identify possible solutions and the amount of revenue required to pay for them.

Finally, the present 650 foot intake tunnel contains four man-holes for worker entry and protection. Gillette personnel presently check our intake tunnel on a daily basis and clean debris collected by the travelling screen three times a week. The design of the 3,700 foot extension provided for no additional man-holes, and as a result, ignores significant safety and maintenance issues.

We hope this letter clarifies our concerns regarding the potentially harmful effect which your proposal would have on the manufacturing operations of The Gillette Company.

Sincerely,

David A. Fausch

JDF/mc

cc: David A. Fausch

RESPONSE TO COMMENTS BY THE GILLETTE COMPANY (March 21, 1983)

114. Since publication of the DEIS/DEIR, a number of changes to the alternatives being evaluated have been made to respond to concerns of the Gillette Company. These changes have required extensive interaction between the MDPW, its consultant and the Gillette Company. See responses to comments numbered 629 through 652 by the Gillette Company.



League of Women Voters of Massachusetts
8 Winter Street
Boston, Massachusetts 02108
TEL. 387-4380

March 21, 1983

Department of Public Works
Central Artery Section
100 Radhus Street
Boston, MA 02114

Comments on the Draft Environmental Impact Statement/Report
Third Harbor Tunnel Project, Interstate 90
EOWA no. 4325

Prepared by Anne Fenton, LWM Transportation Director, on March 16, 1983.

The League of Women Voters supports a balanced transportation system with increasing dependence on public transportation for access to jobs, housing and services, particularly in and around cities, and with minimal disruption of the environment. The League believes that the federal government has a responsibility in federal aid for highway construction so that cities can plan and adequately finance integrated transportation systems of their own choice.

A decision regarding the Third Harbor Tunnel Project is of major significance to the entire state and we realize that adequate highway access to Boston and the surrounding area is a critical issue. The E.I.S. and attendance at numerous sections at which these issues were discussed, the League would agree that the ultimate solution to the traffic nightmare of the Central Artery and tunnels probably had to include a highway option. The option selected, however, must include incentives to non-automobile traffic and minimal construction impacts.

The League believes that an environmental study of the Third Harbor Tunnel project by itself is too narrow an approach to the problem. The E.I.S. should include proposals to reduce traffic and to minimize environmental impact, such as an improved subway system, limousine service, airport access or Central Artery redesign, so that improved highway safety and capacity is only part of a total solution.

The League understands that there is a new proposal to study more options and reach a decision based on this broader study. We would like to participate, through the Joint Regional Transportation Committee and other forums, in this ongoing discussion.

cc. Sec. J. Hoyle

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RESPONSE TO COMMENTS BY THE LEAGUE OF WOMEN VOTERS OF MASSACHUSETTS
(March 21, 1983)

No response necessary.

SIERRA CLUB - New England Chapter

3 JOY STREET, ROOM 12, BOSTON, MASSACHUSETTS, 02108 • 617-237-4329

RECEIVED

March 21, 1983

MAP 21 1983

Secretary James S. Hoyte
Executive Office of Environmental Affairs
100 Cambridge St.
Boston, MA. 02202

OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

Dear Secretary Hoyte,

The Greater Boston Group of the Sierra Club offers the following comments on the "Boston - Interstate Route 90 - Third Harbor Tunnel" project:

The extensive effort that produced the Draft Environmental Impact Statement/Report has been a political exercise which serves no public interest. All the proposals for a Third Harbor Tunnel are unwise. A document of questionable veracity with 4 unacceptable alternatives has been produced at great public cost.

What remains now to be done is to return to the original alternatives of Depressing the Central Artery (including that of incorporating public transportation) as noted in various drafts preliminary to the Third Harbor Tunnel Report, and give serious consideration to this original concept in the context of the real transportation needs of the Greater Boston area.

Very truly yours,

Louise Lewis
Louise Lewis
Greater Boston Group

cc: S. J. Tarsigian, Commissioner
Department of Public Works
Commonwealth of Massachusetts

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RESPONSE TO COMMENTS BY THE SIERRA CLUB, NEW ENGLAND CHAPTER (March 21, 1983)

115. The DEIS/DEIR evaluates in great detail the four Third Harbor Tunnel only alternatives resulting from the Corridor Planning Study. The analyses and the resulting documents are valuable reports which have identified the adequacy of the alternatives in addressing cross harbor vehicular travel demand; as indicated in the analyses, however, improvements in operating conditions on the Central Artery north of the existing Sumner and Callahan Tunnels are not realized solely with the addition of a Third Harbor Tunnel. An SDEIS/DEIR evaluating Central Artery improvements with and without a Third Harbor Tunnel has also been prepared. The FEIS/FEIR documents the planning process and the impacts of the Preferred Alternative and compares the impacts to the No-Build Alternative. Each impact category also includes a summary comparison of all alternatives, and the SUMMARY at the front of the FEIS/FEIR presents a tabular comparison of all alternatives.

RESPONSE TO COMMENTS BY JEFFRIES POINT HARBORSIDE NEIGHBORHOOD ASSOCIATION
(August 25, 1983)

116. The alternatives discussed in this letter have been eliminated from consideration, for many of the reasons enumerated in the letter. The design of the Preferred Alternative is the result of working to alleviate these and other neighborhood concerns; the Preferred Alternative will have many beneficial effects on East Boston. The Preferred Alternative is constructed on Airport property and does not go through Jeffries Cove. Air quality in East Boston will be improved with the Preferred Alternative, as compared to the No-Build Alternative, and local traffic congestion will be reduced on several East Boston streets. East Boston Memorial Stadium will be enlarged by approximately three acres. For a more detailed analysis of the impacts of the Preferred Alternative on East Boston, see Sections 4.4 LAND USE IMPACTS and 4.5 NEIGHBORHOOD AND COMMUNITY FACILITIES IMPACTS in the FEIS/FEIR.

**WRITTEN COMMENTS AND RESPONSES
ON SDEIS/SDEIR**

124. Close coordination during design and construction will occur to assure minimal disruptions to navigation and maritime commerce in Boston Harbor; see Section 4.4.

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U.S. Department
of Transportation
Federal Aviation
Administration

.. 13 1983

Mr. Robert J. ... Tough, P.E.
Chief Engineer
Massachusetts Department of Public Works
Central Artery Section
100 Nashua Street
Boston, MA 02114

Dear Mr. McDonough:

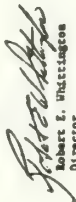
We have reviewed the Supplement to the Draft Environmental Impact Statement/Report, Third Harbor Tunnel, Interstate 90/Central Artery, and have identified several potential obstructions to flight operations of Boston-Logan International Airport. Our review of the preliminary information in the document, and the elevations for the proposed ventilation structures furnished by the project staff, indicates that some of the proposed alignments will cause an obstruction to air navigation.

At the final design stage, a detailed obstruction evaluation will be required for which the proponent shall furnish specific information on the Federal Aviation Administration (FAA) Form 7460-1.

Furthermore, as we had commented earlier on the DEIS for Third Harbor Crossing, adequate mitigative measures must be incorporated in the final design of the connections to the Logan access roadway system, to address the airport access impacts during the construction and over the long term.

We appreciate the opportunity for reviewing the environmental document.

Sincerely,


Robert E. Whittington
Director

cc:
Secretary James S. Boyce
Executive Office of Environmental Affairs

RESPONSE TO COMMENTS BY THE U.S. DEPARTMENT OF TRANSPORTATION, FEDERAL
AVIATION ADMINISTRATION (August 13, 1983)

125. The alignment and ventilation buildings for the Preferred Alternative will not obstruct air navigation. During the design stage, specific information required by FAA will be furnished on FAA Form 7460-1.

126. Measures to mitigate access impacts to the Airport roadway system are discussed in Section 4.4 LAND USE.



DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION
600 BRIMLEY ROAD
WALTON, MASSACHUSETTS 02158

August 25, 1983

Planning Division
Impact Analysis Branch

Mr. James A. Walsh
Division Administrator
Federal Highway Administration
Transportation Systems Center
25 Broadway, 10th Floor
Cambridge, Massachusetts 02142



Dear Mr. Walsh:

We have received and reviewed the Supplement to the Draft EIS/EIS to the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93, Boston, Massachusetts.

The supplement indicates your awareness for Corps of Engineers permits for the 3A, 3A and 3A Modification alternatives. The 3A and 3A Modification alternatives would require dredging and the disposal of dredged materials which previously have not undergone bioassay testing. Bioassay evaluation will be necessary to assess the potential for adverse effects on the environment. It is noted that a fabrication site has not been selected, and as such, it has not been studied for impacts associated with its development. On May 12, 1983 we met with Mr. Arceaglia, B-F-W staff and other agencies to discuss our needs for additional information on bioassays and the fabrication site development. Our concerns were outlined well in a May 12, 1983 memorandum to the project file F38/PCS from Dean Groves.

At this time, we reiterate our preference that bioassay tests be conducted along the 3A and 3A Modification alignments across the harbor. We believe that such tests would be helpful in assessing the feasibility of the alternatives, and would indicate problematic areas in your disposal options. We believe sufficient time has existed since our meeting to conduct the tests and that the results would be available. We remain committed to carry out further environmental analysis for the tunnel alignment and a fabrication site, if a tunnel plan is selected. We note that this sequence of selecting the alternative prior to gathering the information may delay our permit process until our permit and NEPA requirements are satisfied.

Thank you for providing the Final EIS to us for comment. Should you have any questions or wish to discuss these comments further, please contact Mr. Bob Adler of the Impact Analysis Branch at (617) 647-2431, or Mr. Jeffrey Bridge of the Regulatory Branch at (617) 647-2431.

Sincerely,

Joseph L. Ignazio

Chief, Planning Division

Copy Furnished:
Mr. Don Cooke
Off. of Intergovernmental Liaison
Room 2203
17K Federal Building
Boston, MA 02203

RESPONSE TO COMMENTS BY U.S. DEPARTMENT OF THE ARMY, NEW ENGLAND DIVISION,
CORPS OF ENGINEERS (August 25, 1983)

127. As indicated in Section 4.13, bioassay tests have not been performed on the sediments of the harbor-crossing portion of the Preferred Alternative. Based on a review of other sediment analyses in the area, however, it is expected that the Preferred Alternative's sediments will be suitable for ocean disposal. Bioassay tests will be performed on these sediments at a later date; this procedure may affect the COE's permit process, although it is not expected that this procedure will delay construction.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
1 P REMEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

August 22, 1983

Mr. James A. Walsh
Division Administrator
U.S. Department of Transportation
Federal Highway Administration
Transportation Systems Center
55 Broadway, 18th Floor
Cambridge, Massachusetts 02142

RE: DS-FBN-B40050-MA

Dear Mr. Walsh:

In accordance with Section 309 of the Clean Air Act, the National Environmental Policy Act, and Section 404 of the Clean Water Act, we have reviewed the Draft Supplemental Environmental Impact Statement/Report for Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93, Boston, Massachusetts.

As a member of the Interagency Committee for the Third Harbor Tunnel/Central Artery, we appreciate the extensive coordination and planning that has been done in preparing the Draft Supplement. As my staff has discussed with State transportation officials and their consultants, we believe additional information is needed concerning the air quality impacts of the project. We understand that the necessary analyses are now being conducted, and that preliminary results will be made available to us in the immediate future during development of the Final EIS, at which time we may have additional comments. These and other comments, which may be submitted in the Supplement, will be included in our prior comments (enclosed) on the Draft EIS.

In accordance with our national rating criteria, a copy of which is enclosed, we have rated this Draft Supplemental EIS ER-2 (environmental reservations - additional information requested).

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If you have any questions about our comments, I hope that you will contact Elizabeth Higgins of my staff at (617) 233-1740.
Sincerely yours,

Michael R. Deland

Michael R. Deland
Regional Administrator

Enclosures

cc: Doug Conlan, FHWA-Albany
Frank Bracaglia, FHWA-MA
Robert Tierney, MA DPW
Robert J. McDonagh, MA DPW
William Oliver, MA DPW
Joseph Ignazio, COE-NED
Jordan Becker, FWS
Sammy G. Gagliardi, NEPA
Bridget O'Brien, DEQ
Matt Coogan, EOTC

U.S. Environmental Protection Agency
Draft Supplemental Environmental Impact Statement
Third Harbor Tunnel, I-93, Boston, MA
Draft Supplemental Environmental Impact Statement

Project Description

The proposed action is made up of two projects: the Third Harbor Tunnel and the Central Artery Improvements. The Draft Supplemental Environmental Impact Statement for the Third Harbor Tunnel, I-93, Boston, MA, released in December, 1982, addressed four "build" alternatives and the "no-build" (base case) for the Third Harbor Tunnel. The Draft Supplement addresses three additional alternatives for cross-harbor and Central Artery improvements as well as a new "no-build" option involving only limited improvements to the Central Artery. The alternatives evaluated in the Draft Supplement are as follows:

Alternative 1 - Central Artery Improvements - Redesign of the Central Artery road surface, selected modifications to existing ramps, and the addition of acceleration/deceleration lanes, with no increase in roadway capacity and no tunnel.

Alternative 1A - Central Artery Depression and Widening with a Third Harbor Tunnel through Jeffries Cove to the Airport via Fort Point Channel - A one-way five-lane northbound split alignment tunnel from the Airport through the Central Artery interchange with the Dorchester Avenue overpass, through the Fort Point Channel; a two-lane tunnel through Jeffries Cove emerging at a depressed toll plaza on airport land, and connecting to Route 1A; a depressed and widened Central Artery with four northbound lanes emerging at Causeway Street and crossing the Charles River on a low level bridge, and four southbound lanes; all lanes of the Dewey Square Tunnel will be southbound.

Alternative 1B - Central Artery Depression and Widening with a Third Harbor Tunnel via South Boston through Jeffries Cove to the Airport - Same alignment as Alternative 1A along the Central Artery and across the Charles River but with no new Dorchester Avenue; the tunnel following a Seaport Access route from South Bay through South Boston, linking the Massachusetts Turnpike/Central Artery interchange with Logan Airport and Route 1A via Jeffries Cove; a depressed toll plaza on airport land as in Alternative 1A.

Alternative 3A Design Modifications - Identical to Alternative 5A from Fort Point Channel to the proposed interchange at Northern Avenue, but includes a new Dorchester Avenue over the tunnel in the Channel; a one-way toll plaza on Commonwealth Street; separate connections to Northern Avenue and Summer Streets near the Boston Marine Industrial Park; four-lane tunnel across the Harbor from the proposed interchange at Logan Airport to the Harbor; a two-lane version of this modification is also examined.

Alternative 6 - Central Artery Depression and Widening Only - Includes construction in the Fort Point Channel as part of the Central Artery improvements but does not provide a tunnel or seaport access facility; Central Artery depression and widening is the same as for Alternatives 1A and 5A.

Air Quality Impacts From Mobile Sources

The Draft Supplement describes design modifications to Alternative 5A which if implemented may result in changes in projected air quality impacts, but lacks an air quality analysis comparable to that which was done for the other alternatives. Based on our discussions this week with State transportation officials and on the fact that the Central Artery improvements and the Third Harbor Tunnel will be of the same level of detail as was conducted for the other alternatives, is now being prepared and will be made available to EPA and the State air staffs before it is in its final form and before release of the final EIS. This will ensure that there is adequate time to properly review the modified Alternative for consistency with the Massachusetts State Implementation Plan (SIP) and for comparison to other alternatives.

The Draft Supplement presents air quality impacts in terms of separate sources from roadways, toll plazas, tunnels and ventilation buildings. However, as we noted in our comments on the Draft EIS, some receptors are impacted by several of the project components, and therefore the Final EIS should describe the cumulative impact (including background) at each receptor, identifying the contributing sources and comparing the impacts to the National Ambient Air Quality Standards. Only after the calculation of the cumulative impact on receptors can we reasonably assume that air quality improvements or degradation between the various "build" and "no-build" alternatives be compared.

We believe the potential exists, during the construction phase of the project, for violation of air quality criteria contained in the SIP, thus resulting in deterioration of air quality for an extended period of time. The Draft Supplement discusses the air quality consequences of construction only in a general way, and does not discuss the potential for cumulative impacts of detour routing and consequent air quality impacts. We hope that the Final EIS will describe with as much detail as is currently possible the detour routes for the chosen alternative and mitigation measures such as traffic control measures and improved mass transit service in the affected area. In addition, we would appreciate the opportunity to participate in the scoping and review of the construction phase air quality analysis.

- The results of the Mesoscale analysis indicate that all alternatives except Alternative 6 will result in some increases in nonmethane hydrocarbons (NMHC) when compared to the no-build alternative for the same year. The Draft Supplement (page 209) states that the increase in NMHC emissions is due to the project travel criterion for consistency determination with the SIP, offsetting NMHC emissions from other projects in the existing Transportation Improvement Project element of the SIP will have to be identified and evaluated such that an overall reduction of NMHC emissions on a region-wide basis can still be achieved. We believe that in addition to this commitment, the Final EIS should identify and commit to implementing all reasonable and feasible mitigation measures that are applicable to the selected alternative.

Air Quality Impacts From Stationary Sources

- The air quality assessment for the ventilation buildings focuses only on nitrogen dioxide (NO₂) and lacks any discussion of carbon monoxide (CO) impacts. As we have discussed, the building and eight-hour carbon monoxide impacts of the ventilation building are identified in the Final EIS and included in the total impact calculation.
- A sensitivity analysis was performed comparing the results of two analyses with the EPA Industrial Source Complex Model (ISC), one using 16 wind directions and the second using 36 wind directions. The Final EIS should quantitatively discuss the results of this sensitivity analysis as support for using 16 wind directions instead of the 36 normally used in the modeling study.

404 Activities

- The Draft Supplement states that 215,300 cubic feet of water will be displaced along the Charles River, and that the Charles River bulkhead will be realigned and rebuilt, but lacks any quantitative assessment of this aspect of the project. The final EIS should discuss the potential impacts of the proposed construction impacts, and any other consequences associated with the proposed action in the Charles River/North Station area. A diagram showing the existing bulkhead, future bulkhead lines, and areas of fill, and a description of the future appearance of the area would be helpful.
- Consistent with our Guidelines under Section 404(b) of the Clean Water Act, the proposed project should be designed so that the ecosystem be minimized or avoided to the extent practicable. We would prefer alternatives that could avoid filling the Charles River. A realignment of the connector and utilization of the existing upland parcels for the connector and pedestrian walkway should be evaluated in the Final EIS. Other modifications to reduce impacts such as building the pedestrian walkway as a pile and timber structure should also be explored.

- According to the Draft Supplement, a potential use of nearly three million cubic yards of clay material excavated for the depressed Central Artery as an off-capping of sanitary landfill material would be to use it as a fill material for the project. Pursuant to Section 1424(e) of the Safe Drinking Water Act, EPA has designated the Cape Cod aquifer as the sole or principal source of drinking water for Cape Cod and that, as a result, the disposal of the excavated material from this project on Cape Cod would require a review by EPA Region I's Drinking Water Branch to determine whether the water supply would be adversely affected.

RESPONSE TO COMMENTS BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION I (AUGUST 22, 1983)

- 128. The results of this analysis were presented to EPA and DEQ air staffs in October 1983.
- 129. See response to EPA comment number 39 on DEIS/DEIR: background concentrations are included in the tabular presentations.
- 130. As discussed with EPA and DEQ air staffs, detailed air quality analysis during the construction period was not possible for the Preferred Alternative and other Central Artery depression alternatives, because detour routes and traffic assignments are not known. A qualitative analysis was performed on construction period traffic. During the design phase, when actual staging plans and detour plans are developed, detailed construction period air quality analysis and documentation will be performed with coordination from EPA and DEQ.
- 131. As stated in Section 4.7.1 Mesoscale Analysis, measures to mitigate increases in Non-Methane Hydrocarbons in the design year are not necessary.
- 132. The air quality impact analysis on the Preferred Alternative includes CO impacts from the ventilation buildings as a result of coordination with EPA staff.
- 133. Results of the sensitivity analysis have been provided to EPA under separate cover as documentation for the use of the 16 wind direction method.
- 134. Impacts of this construction are discussed in Section 4.9 WATER RESOURCES; Figure 60 presents the information regarding this filling requested by EPA.
- 135. Other alternatives for the Leverett Circle connections are discussed in the PEIS/EIR in Section 2.5.2 Other Design Considerations. Further refinement during the design phase will address the requirements to minimize filling in the Charles River. Extensive coordination with the HPC and BRA is also necessary in this area to resolve this project's inconsistencies with the different plans of those agencies.
- 136. If any clay material is to be disposed of in this manner, EPA will be involved in the evaluation of impacts.



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20540

ER 82/346

Mr. James A. Walsh
Division Administrator
Federal Lands Administration
Transportation Systems Center
55 Broadway, 14th Floor
Cambridge, Massachusetts 02142

AUG 29 1982



Dear Mr. Walsh:

This is in response to the request for the Department of the Interior's comments on the proposed conversion of the Central Artery/Tunnel for the Third Harbor Tunnel, I-90/Central Artery, and I-93, Suffolk County, Massachusetts.

SECTION 4(f) STATEMENT COMMENTS

Recreational Resources:

As stated in our letter of April 7, 1983, we concur that there are no feasible and prudent alternatives to the use of land from the East Boston Memorial Stadium and Third and Third Streets for the proposed conversion of the Central Artery/Tunnel. We also concur that there are no feasible and prudent alternatives to the use of land from the Charles River Basin Historic District, and the use of land and properties in the Causeway-North Washington Historic District, and the use of land and properties in the Causeway-North Washington Historic District, and the use of land and properties in the Causeway-North Washington Historic District.

We concur with your proposed measures to minimize harm to these four historic districts but with the proviso that adequate recreation be undertaken for any demolished historic structures, and that the recommendations of the Massachusetts Historical Commission and the Boston Landmarks Commission be included in project planning and evidenced in subsequent project documentation.

We concur that any recovery and/or protection of data in situ is appropriate for any impacted archaeological resources that may be discovered in your Phase II survey.

Section 6(f)
Recreational development at the Charles River Basin Reservation has been authorized through the Land and Water Conservation Fund Act (16 U.S.C. 460-467). Public Law 96-316, a program administered by the NPS. Any conversion of any property to a non-Federal use in the Basin may require compliance with the Section 6(f) replacement provisions of the Act. In coordination with the NPS and the State Division Office (SDO) should be undertaken. The NPS and the SDO should be consulted regarding the proposed conversion of the Charles River Basin Reservation. James S. Myers, Secretary of Environmental Affairs, State Office Building, 100 Cambridge Street, Boston, MA 02202.

Should any Section 6(f) conversions be involved in this project, the NPS would be willing to consider a request for such conversion upon submission by the SDO. Any conversion consideration under Section 6(f) first requires Section 4(f) approval of the project by FHLA. In addition, the conversion must be in accord with the States comprehensive outdoor recreation plan, and appropriate replacement land of at least equal fair market value and of reasonably equivalent usefulness and location must be provided.

ENVIRONMENTAL STATEMENT COMMENTS
The comments provided in our letter of April 7, 1983, on the draft statement, with regard to the environmental impacts of tunnel fabrication sites and sites for disposal of excavated material, are still applicable to the present supplemental draft statement. We note, however, your firm commitment that further environmental analysis and

Excavated material means (a) the "muck" which would be excavated from the harbor floor for the Third Harbor Tunnel trench and (b) the overburden which would be removed for the I-90/Central Artery Depression.

Mr. James A. Walsh

Cultural Resources:

As stated in our letter of April 7, 1983, we concur that there are no feasible and prudent alternatives to the use of land in the Fort Point Channel Historic District, and the FHLA determine that one of the tunnel alternatives is necessary to satisfy the transportation needs of the Boston area. We also concur that there are no feasible and prudent alternatives to the use of land in the Charles River Basin Historic District, and the use of land and properties in the Causeway-North Washington Historic District, and the use of land and properties in the Causeway-North Washington Historic District, and the use of land and properties in the Causeway-North Washington Historic District.

We concur with your proposed measures to minimize harm to these four historic districts but with the proviso that adequate recreation be undertaken for any demolished historic structures, and that the recommendations of the Massachusetts Historical Commission and the Boston Landmarks Commission be included in project planning and evidenced in subsequent project documentation.

We concur that any recovery and/or protection of data in situ is appropriate for any impacted archaeological resources that may be discovered in your Phase II survey.

Section 6(f)

Recreational development at the Charles River Basin Reservation has been authorized through the Land and Water Conservation Fund Act (16 U.S.C. 460-467). Public Law 96-316, a program administered by the NPS. Any conversion of any property to a non-Federal use in the Basin may require compliance with the Section 6(f) replacement provisions of the Act. In coordination with the NPS and the State Division Office (SDO) should be undertaken. The NPS and the SDO should be consulted regarding the proposed conversion of the Charles River Basin Reservation. James S. Myers, Secretary of Environmental Affairs, State Office Building, 100 Cambridge Street, Boston, MA 02202.

Should any Section 6(f) conversions be involved in this project, the NPS would be willing to consider a request for such conversion upon submission by the SDO. Any conversion consideration under Section 6(f) first requires Section 4(f) approval of the project by FHLA. In addition, the conversion must be in accord with the States comprehensive outdoor recreation plan, and appropriate replacement land of at least equal fair market value and of reasonably equivalent usefulness and location must be provided.

ENVIRONMENTAL STATEMENT COMMENTS

The comments provided in our letter of April 7, 1983, on the draft statement, with regard to the environmental impacts of tunnel fabrication sites and sites for disposal of excavated material, are still applicable to the present supplemental draft statement. We note, however, your firm commitment that further environmental analysis and

Excavated material means (a) the "muck" which would be excavated from the harbor floor for the Third Harbor Tunnel trench and (b) the overburden which would be removed for the I-90/Central Artery Depression.

Mr. James A. Walsh

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documentation about these two project-related matters will be undertaken as project design progresses. Although we recommended that these matters be thoroughly discussed in the final environmental statement for this project, we are cognizant that such discussions are first contingent upon a decision that each component of the total project must be implemented. We will then submit a determination of the project's cumulative impacts to the Council on Environmental Quality (CEQ) (40 CFR 1502.2.1, etc.). Therefore, we are willing to agree to such discussions in a "design-level" supplement to the final statement. We urge that such a supplement to the final statement be developed as soon as possible to avoid future project delays during required permit reviews and that an early "notice of intent" be given by you when this activity will commence.

Disposal of excavated material from the depression and widening of the Central Artery in Boston is a major project component. We understand that the project team has an opportunity for beneficial use. However, since many wetland areas are former wetlands, they are likely to be adjacent to and in close proximity to existing wetlands. Any capping should be done in a manner to avoid any encroachment or further degradation to any wetlands, and appropriate techniques to effect this should be included in project plans. We also urge that similar and beneficial use of dredged material be developed if tunnel construction is approved.

Potential impacts to anadromous fish also need further discussion. If an alternative involves the Charles River is selected, restrictions for construction activities during the spring spawning runs should be incorporated in project plans. per the recommendations of the Massachusetts Department of Fisheries and Wildlife, the National Marine Fisheries Service and the U.S. Fish and Wildlife Service.

FISH AND WILDLIFE COORDINATION ACT COMMENTS

Item 6 on page viii of the document identifies several types of Federal permits/analyses for project work. Various methods. The U.S. Fish and Wildlife Service (FWS) has a consultative involvement under the Fish and Wildlife Coordination Act for these actions.

Since neither the draft environmental statement nor the present draft supplement adequately discuss impacts related to possible tunnel fabrication sites and sites for the disposal of excavated material, and since it is unlikely that the final statement will do so for reasons recognized earlier, additional site-specific assessments and environmental review are necessary and should be included in the project plans. Such assessments and review are needed. We urge that such site-specific work be undertaken as soon as possible.

It is normal practice, under your "one-stop" review process, for the FWS to provide an early indication of its probable position and recommendations in forthcoming permit reviews. Insufficient information precludes FWS to do so at this time. However, the FWS advised that it will not likely object to any project-related dredge and fill activities that are consistent with the National Wetlands Inventory (NWI) and that avoid and adequate mitigation is included in project plans to fully compensate for unavoidable impacts. The FWS also advises that it stands ready to cooperate and

Mr. James A. Walsh

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coordinate with you, Massachusetts Department of Public Works, the Corps of Engineers, appropriate State and local agencies and other involved parties in the evaluation and planning work for these facets of the project.

SUMMARY COMMENTS

The Department of the Interior has no objection to Section 4(f) removal of the Third Highway, 100 ft. of the project area. The project area is not a designated historic site. harm discussed above for the use of the 4(f) areas are adequately addressed in subsequent project documentation and included in project plans.

Both the draft environmental statement and the present draft supplement are inadequate in their discussion of environmental impacts related to specific tunnel fabrication sites and sites for excavated material disposal. As presently proposed, these aspects of the project are environmentally unsatisfactory.

We note your commitment that further site-specific assessments and environmental studies for this work will be undertaken and addressed in a "design-level" supplement to the final environmental statement for this project. We agree to this procedure, but at the same time, would alert you that unless the above issues are satisfactorily resolved prior to release of the final version of such a supplement, there is a high probability that we would defer these aspects of the project to the Council on Environmental Quality in accordance with the Council's regulations.

As this Department has a continuing interest in this project, we would be pleased to work with you and to provide technical assistance in your subsequent planning for the project. For questions relating to recreational and cultural matters, please contact the Regional Director, Mid-Atlantic Region, National Park Service, 123 South Street, Philadelphia, PA 19105, phone: FTS 557-7012, comm. 219/527-7231. For matters pertaining to fish and wildlife resources, please contact the Field Supervisor, U.S. Fish and Wildlife Service, P.O. Box 158, 95 Pleasant Street, Concord, New Hampshire 03301 (Phone: FTS 634-4791, comm. 503/224-2585).

We appreciate the opportunity to provide these comments.

Sincerely,

John A. McDaniel
John A. McDaniel, Director
Bureau of Land Management
Environmental Project Review

cc: (next page)

Mr. James A. Walsh

cc: Mr. Robert J. McDonagh, P.E.

Mr. James A. Walsh
Massachusetts Department of Public Works
100 Nassau Street, Room 530
Boston, MA 02114

Mr. James S. Hoyte
Secretary of Environmental Affairs
State Office Building
100 Cambridge Street
Boston, MA 02102

Mrs. Patricia L. Heslowksi
Executive Director
MA Historical Commission
294 Washington Street
Boston, MA 02103

Mr. Robert E. Temple
Acting Regional Director, Northeast Region
National Marine Fisheries Service
Fall Bldg
Gloucester, MA 01920

Colonel C.B. Scoble
Division Engineer, New England Division
U.S. Army Corps of Engineers
424 Trapelo Road
Malden, MA 02254

RESPONSE TO COMMENTS BY THE UNITED STATES DEPARTMENT OF THE INTERIOR, OFFICE OF THE SECRETARY (AUGUST 29, 1983)

137. Specific measures that will be incorporated into the project to minimize harm to Section 4(f) properties are discussed in Section 5.0. There will be coordination with the appropriate agencies on the design details of these measures. The involvement of local communities in design of future land uses is described in Section 4.4 Joint Development.
138. The Section 106 Memorandum of Agreement and other documentation on the Section 106 process discuss measures to minimize harm to cultural resources; see COMMENTS AND COORDINATION; see also Section 5.0, SECTION 4(f) EVALUATION.
139. The Preferred Alternative will not use property which has been improved with Section 6(f) funds. See Section 5.0, SECTION 4(f) EVALUATION. Coordination has taken place with both NPS and the State Liaison Officer (see COMMENTS AND COORDINATION).
140. See responses to previous comments (58-63) by U.S. Department of the Interior. The necessary environmental analysis and documentation may not involve a supplement to the PEIS/FEIS; for example, an Environmental Assessment may be adequate.
141. With respect to disposal of dredged and excavated materials, regulations in effect at the time of permit applications shall apply.
142. Restrictions which may be imposed on construction activities in the Charles River will be discussed further with the appropriate regulatory agencies during construction.
143. See response to comment number 140.
144. FHWA and MDPW will coordinate with the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, and all appropriate state and local agencies during the design phase to assure that adequate mitigation measures are included in the project to avoid significant adverse impacts.



General Services Administration - Region I
John W. McGowan, Jr., Post Office and Courthouse
Boston, MA 02109

August 19, 1983

Mr. Robert J. McDonagh, P.E.
Chief Engineer
Massachusetts Department of
Public Works
100 Nashua Street
Room 530
Boston, MA 02114

Dear Mr. McDonagh:

I am pleased to take this opportunity to provide written comments on the Draft Environmental Impact Statement (December 1982) and its Supplement (June 1983) regarding the proposed Third Harbor Tunnel and Central Artery Projects. Our initial comments were presented at the public hearing on August 8, 1983 by Miss Beverly L. James, Director of our Planning Staff.

Our primary concern is with the projected taking of our Appraisers Stores (Customs) Building under Alternative 3A. The General Services Administration has already expended \$3.5 million for Phase I of renovations to this building and anticipates awarding a contract of about \$1.2 million by the beginning of 1984 to complete Phase II of this project. The taking of the Appraisers Stores under Alternative 3A would impose significant adverse impacts on the Government in terms of the improvements already made to the building. And, it would require the Government to find replacement lease space. Hence, we are strongly opposed to this alternative.

Your Draft Environmental Impact Statement also indicates that the Appraisers Stores building will be subject to potentially serious impacts from proposed exhaust ventilation towers to be constructed from proposed ventilation alternatives. Specifically in the form of excessive concentrations of particulate matter and noise source. In order to protect the health of the employees to be housed in our building, I request that appropriate mitigating measures in the design and location of vent buildings be taken.

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Also, your vibration impact analysis suggests that the Appraisers Stores building will be subjected to possible minor levels of architectural damage as a result of construction activity along the Central Artery. Your project design and construction should be coordinated with GSA at this location to ensure that vibration that on-going Government operations at this location would not be impaired. Any chance of structural damage as a result of construction activity should be totally precluded.

Assuming scheduled completion of the Appraisers Stores renovation and construction of the new Federal Office Building on Causeway Street by mid-1986, we anticipate no problems with the relocation of the Appraisers Stores building. Since GSA is currently leasing a new building, we would like to see any change in either of our project schedules would have to be coordinated.

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As you have noted in the Draft Environmental Impact Statement, the MBTA is currently considering various alternatives for relocation and improvements to the Green Line in the North Station area. All necessary coordination between the MBTA and GSA should be completed by mid-1986. We would like to see any relocation of the Appraisers Stores building coordinated with the MBTA location assumed removal of the Green Line elevated tracks.

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It is evident that adverse traffic detours, congestion and parking problems will affect the new Federal Office Building, the Appraisers Stores and other Government facilities in downtown Boston for extended periods under all of the "build" alternatives. It is requested that GSA be consulted in any relocation of the Appraisers Stores building, as they have direct accessibility to Government buildings and Government operations.

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Please do not hesitate to contact Mr. Gil Strobel, Assistant Regional Administrator, Office of Public Buildings and Real Property, (223-2608) or myself if you have any questions concerning these comments.

Sincerely,


PETER J. THOMAS

Acting Regional Administrator

cc: Mr. James A. Walsh
Division Administrator
Federal Highway Administration

RESPONSE TO COMMENTS BY THE GENERAL SERVICES ADMINISTRATION - REGION I
(August 19 1983)

145. Alternative 3A has been rejected.

146. See Section 4.7 AIR QUALITY; mitigating measures will be included in the project as appropriate to meet air quality standards and policies of the appropriate federal, state, and local agencies.

147. Vibration impacts and potential mitigation measures are discussed in Section 4.8 NOISE AND VIBRATION. Such measures will be coordinated with GSA to assure that adequate mitigation measures are included in the project.

148. Coordination with GSA will occur to assure consistency of project schedules.

149. The Preferred Alternative has no adverse effect on the proposed relocation of the Green Line facilities at North Station although removal of the highway viaduct creates new opportunities for relocation of the Green Line facilities. Because of the proposed Central Artery construction in the North Station area, there will be extensive coordination with concerned parties during design.

150. See above responses regarding coordination.

C 22314



FIELD REAL ESTATE AND BUILDINGS OFFICE

P.O. Box 254
Lansdown, MA 02157-0254

August 8, 1983

Mr. Robert T. Tierney
Commissioner
The Commonwealth of Massachusetts
Executive Office of Transportation and Construction
Department of Public Works
100 Babson Street
Boston, MA 02116

Dear Mr. Tierney:

As a follow up to our meeting at South Postal Annex on Thursday, August 4th, 1983, I received my first copy of the Supplemental Draft Environmental Impact Statement/Report concerning the Boston - Interstate Route 90 - Third Harbor Tunnel and Interstate Route 93 - Central Artery.

As you are aware from our discussions at the subject meeting, the Postal Service in general, and this office in particular, was completely unaware of any of the specifics concerning the subject Impact Statement. Coupled with this lack of knowledge and the voluminous nature of the previously referenced document, it is impossible for us to comment in detail by your deadline of August 22, 1983.

As we discussed on Thursday, we have alternative plans for the utilization of the parking lot you intend to use in the construction of the subject tunnel. These plans include not only its present parking capabilities, but near term construction of a substantial building and the future potential for marketing the air rights of this parcel. Furthermore, the significant disruption to Postal operations and perhaps the building structure of South Postal Annex itself will require careful consideration.

Therefore, the best I can offer you at this time is our statement of good faith to work with the Commonwealth of Massachusetts in this worthy project, and we look forward to continued dialogue and cooperation.

Sincerely,

Special Manager

cc/7

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United States
Postal Service

15/JNB/pw

August 22, 1983

Mr. Robert J. McDonagh
Chief Engineer
Massachusetts Dept. of Public Works
100 Nassau Street
Boston, MA 02116-1176

Dear Mr. McDonagh:

As an interested party to the proposed Depressed Central Artery/Tunnel project, we received your letter dated August 18, 1983, regarding the Draft and Supplemental Draft Environmental Impact Statement.

If you have any questions in this regard, please feel free to call me at (617) 223-2401.

Sincerely,

Philip J. Sullivan
MSC/Manager/Postmaster
Boston, MA 02205-9998

RESPONSE TO COMMENT BY THE U.S. POSTAL SERVICE, FIELD REAL ESTATE AND BUILDINGS OFFICE (August 8, 1983)

151. A discussion of the impacts of the project on the Postal Service's property is contained in Section 4.4 LAND USE. Measures to mitigate lost parking are also discussed in that section. Coordination of the project with the Postal Service will continue throughout the design phase to avoid and/or minimize impacts to this property.

MEMENTS OF:

PHILIP L. SULLIVAN
HSC Manager/Postmaster
Boston, Mass.

Re: Proposed Third Harbor Tunnel/
Depressed Central Artery

The Boston Post Office and, more specifically, our General Mail Facility on Dorchester Avenue along Fort Point Channel is the Mail Distribution Center for the eastern half of Massachusetts. As such, we process approximately two and one quarter billion pieces of mail annually and provide service to 2.5 million residential customers and over 40,000 business firms.

The General Mail Facility houses the Boston Management Sectional Center, which has administrative responsibility for postal operations in 163 post offices in the Metropolitan Boston area. In addition, various technical activities, such as procurement, transportation, and the Postal Inspection Service which are domiciled here, provide support to offices throughout the New England area. The Boston Post Office employs over 10,000 people, and 4,500 of these employees work at the Dorchester Avenue complex. Moreover, our bi-weekly payroll of 10 million dollars makes us one of the most viable economic entities in this area.

We would like to state for the record that the Postal Service is not opposed to widening and depressing the Central Artery, or to a third harbor tunnel. As a matter of fact both remedies would greatly relieve the problems we experience travelling in and around the city, and to and from our Air Mail Facility at Logan Airport.

-2-

However, after a careful review of the Draft Environmental Impact Statement, we find we cannot endorse the Proposal in its present form. While we laud your efforts to fully address the "neighborhood" infringement issue, we feel the economic vitality and operational needs, particularly those of industries in the Fort Point Channel area, have not been adequately addressed. We believe the Proposal in its present format would have a detrimental impact on postal operations at this facility. Our specific concerns are as follows:

TRAFFIC IMPAIRMENT.

It is our belief that access to our facility would be disrupted throughout the lengthy construction period. At the present time, approximately 700 postal and mailers' vehicles enter and leave this facility each day. In addition, we have employees, suppliers, and visitors for whom access would be restricted or delayed during the lengthy construction period.

Furthermore, we do not feel the present Proposal gives us adequate assurance that the termination point of the third harbor tunnel will not have an adverse impact on traffic movement between our Air Mail Facility and planeside at Logan Airport.

STRUCTURAL IMPAIRMENT

The construction proposed, under any of the present alternatives, gives rise to serious concerns as to whether damage to postal property and/or equipment would result from changes in

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the water table or from vibrations inherent in the construction process. Moreover, there has been no assessment of the continuing vibration problems that will result from a permanent traffic plan once construction is completed.

We also have no assurance that the proposed construction would not disrupt the discharge of postal sump pumps, located below ground level, which presently empty into Fort Point Channel. Any adverse impact in this regard would seriously impede our ability to operate.

ENVIRONMENTAL CONCERNS

One of our prime concerns is the impact this project would have on our employees, resulting from dust, noise, distraction, and inconvenience related to the proposed construction project, as well as those associated with airborne contamination from the proposed tunnel vent house..

We also believe that the proposed extension of the Roxbury Conduit to Fort Point Channel for the discharge of untreated waste would give rise to serious environmental concerns, particularly for firms in this area. While the Metropolitan District Commission has tentative plans for a Waste Treatment Center to address this problem, we feel this project should be given a priority status. While we recognize this item is not part of the present Proposal, it is our firm belief that the State should make certain the problem is addressed and resolved concurrently with the final design package.

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OPERATIONAL INFRINGEMENT

We believe that the concurrent construction of the new South Station Transportation Center along our west property line and the Tunnel/Central Artery project along our south and east property lines would seriously impede our ability to provide timely mail service to the Metropolitan Boston area.

In addition, under the favored Modified 5-A Proposal, we would lose a substantial portion of our employee parking area, off "A" Street. Since many of our employees have duty hours that do not correspond with the availability of public transportation, we have a contractual obligation to provide employee parking. In addition, we had planned to construct a building on this site in the very near future. This would not be possible under the current Proposal, and it would appear that a large proportion of our parking area would be lost throughout the construction process, and some permanently.

In closing, I would like to reiterate that the Boston Post Office is not opposed to any project that would contribute to the economic vitality of this City and address the serious traffic problems which currently exist. And, while we go on record as opposed to the Proposal in its present format because we feel it would have a serious impact both on our ability to operate, as well as on the health and safety of the 4,500 employees of this facility - we stand ready and willing to work with State officials on an alternate plan that would mitigate, to a significant extent, the adverse impacts the current Proposal would have on our operation.

As an extremely viable economic entity in the Boston area, we would also like to have the opportunity to be involved in the final design process.

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RESPONSE TO COMMENTS BY THE UNITED STATES POSTAL SERVICE (August 22, 1983)

152. Construction staging has been developed with the assumption that access to the South Postal Annex will be maintained during construction. This is a major reason for the tunnel's location within the Channel rather than below existing Dorchester Avenue. Extensive coordination will be required during design and construction phases.

153. Access to the Postal Service's facilities at Logan Airport will be maintained at all times.

154. Groundwater observation wells and monitoring of these levels will be included in the design to assure that changes in groundwater levels are not significant.

Vibration impacts during construction and long-term are discussed in Section 4.8 NOISE AND VIBRATION. Effects on South Postal Annex are addressed in that section. To mitigate vibration impacts during construction, preaugering for sheeting or use of low displacement piles are included.

155. Existing discharges will be accommodated in the project construction, to assure no disruptions to the discharges resulting from the project.

156. While the proposed project will not preclude construction of the CSO treatment plant in this area, there can be no assurances that the two projects will be constructed concurrently. EOTC is working with other state agencies to seek an early construction date for the CSO plant.

157. The South Station Transportation Center project is now under construction. As noted above, access to the South Postal Annex will be maintained during construction of the Third Harbor Tunnel/Central Artery project, and will require close coordination with the Postal Service.

158. Impacts to the Postal Service parcel in South Boston are addressed in Section 4.4 LAND USE; mitigating measures are similarly discussed.

Advisory
Council On
Historic
Preservation

1121 K Street, NW
Washington, DC 20005

AUG 1983

Mr. James A. Walsh
Division Administrator
Federal Highway Administration
Transportation Systems Center
23 Broadway, 10th Floor
Cambridge, MA 02142

RE: Third Harbor Tunnel, Interstates 90 and Central Artery, Interstate 93,
Boston, Massachusetts

Dear Mr. Walsh:


The Massachusetts Department of Public Works (MDPW) has provided us with a copy of the Supplemental Draft Environmental Impact Statement/Report for the referenced project.

The Supplemental DEIS identifies adverse and other possible effects on many historic properties eligible or potentially eligible for the National Register of Historic Places. These properties include Faneuil Hall Markets, Long Wharf, and Boston Wharf, and the following Historic Districts: Blackstone Block, Bulfinch Triangle, Charles River Basin, Custom House, Causeway-North Washington Streets, North End, Old Waterfront, Fulton Commercial, and Fort Point Channel/South Boston.

We understand that the Federal Highway Administration and MDPW are currently working with the Massachusetts State Historic Preservation Office to identify historic resources and to make specific findings of effect on historic structures and archaeological properties. Thereafter, we note your expressed intention to seek the Council's comments pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. At that time we would appreciate copies of the Historic Resources Report and Archaeological Survey Report referenced in the Supplemental DEIS' Table of Contents.

In the meantime, we will maintain a file on this project. If you have any questions, please contact Kate M. Perry at FTS 254-3495.

Sincerely,


John L. Elias
Chief, Eastern Division
of Project Review

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Mr. Robert J. McDermough, P.E.
Chief Engineer
Massachusetts Department of Public Works
100 Nashua Street
Room 330
Boston, MA 02114

James S. Boyce
Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

RESPONSE TO COMMENTS BY ADVISORY COUNCIL ON HISTORIC PRESERVATION (August 1, 1983)

Subsequent to publication of the SDEIS/SDEIR, a Preliminary Case Report and a Section 106 Memorandum of Agreement have been accepted by the Advisory Council, the Massachusetts SHPO, and others.

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
BULFINCH BUILDING, 18 NEW CHURCH STREET
BOSTON, MASSACHUSETTS 02114



REGION 1

66795

RECEIVED
AUG 1 1983

Mr. James A. Walsh, Division Administrator
Federal Highway Administration
U.S. Department of Transportation
55 Broadway Street - 10th Floor
Cambridge, Massachusetts 02142

Mr. Robert J. McDonagh, Chief Engineer
Massachusetts Department of Public Works
100 Nassau Street
Boston, Massachusetts 02114

Dear Sirs:

SUBJECT: Supplemental Draft Environmental Impact Statement/Report
for
Boston - Interstate Route 90 - Third Harbor Tunnel
and
Interstate Route 93 - Central Artery

The Department of Housing and Urban Development is making limited observations to assist Boston and the larger metropolitan region in environmental matters with regard to their obligations under HUD assisted Community Development and assisted Housing Programs.

Under the no-build alternative, to include redesigning of the Central Artery only, the core roadway system must carry significantly higher volumes of traffic, thereby, creating longer hours of congestion. From the HUD perspective, air and noise quality, in particular, would become progressively worse. With an acceleration of regional traffic movement and housing development, the built environment will continue to suffer under the no-build alternative.

Not either of the build alternatives (depressing the Central Artery and constructing a third harbor tunnel in either the existing railroad or airport alignments) would interface adversely with any of HUD's goals and objectives. Either of the build alternatives should produce improved traffic movement which will have positive impacts on community and housing development in the metropolitan region.

Depressing the Central Artery will greatly improve visual contact downtown, toward the waterfront, and the North End's historic resources, which are much desired attributes of the city's built environment. The final designs must include mitigating measures to minimize unwanted traffic snarls, so that the improved access through the city will have a positive impact on locational housing choices throughout the region.

It would be preferable that tunnel traffic surface on Logan Airport property than in East Boston's residential neighborhoods.

This Office does not object to the proposed treatment of the four publicly-owned recreation areas under either of the build alternatives with respect to the required 4(f) analysis. There does not appear to be any other viable alternative with less of an impact on the East Boston Municipal Stadium, the Bird Island Flats Park, The Paul Revere Landing Park or the Charles River Basin Reservation.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement/Report for the proposed Central Artery improvements, the proposed Third Harbor Tunnel and the effects on publicly-owned recreation areas.

Sincerely,

Carl J. Owers
Carl J. Owers
Environmental Clearance Officer

RESPONSE TO COMMENTS BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT,
REGION 1 (August 1, 1983)

159. Tunnel traffic will surface at Logan Airport, not on residential streets; see description of the Preferred Alternative, Section 2.2.1 in the FEIS/PEIR.



The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

100 Cambridge Street

Boston, Massachusetts 02202

RECEIVED
H-F-M-W

MICHAEL S. DUKE
Governor
JAMES S. MOYNE
Secretary

SEP 13 1983

JOINT VENTURE

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS ON THE SUPPLEMENTAL DRAFT ENVIRONMENTAL DRAFT REPORT

PROJECT NAME : Third Harbor Tunnel and
Depressed Central Artery
PROJECT LOCATION : Boston
EQA NUMBER : 6325
PROJECT PROPONENT : Mass. Department of Public Works
DATE NOTICED IN MONITOR : July 11, 1983

The Secretary of Environmental Affairs herein issues a statement that the Draft Environmental Impact Report (DEIR) for the Third Harbor Tunnel and Depressed Central Artery, prepared by the Massachusetts Department of Public Works, is in compliance with Massachusetts General Laws, Chapter 30, Section 61-62M inclusive, and the regulations implementing NEPA.

This certificate covers both the December 1982 Draft EIR and the June 1983 Supplemental Draft EIR. Unless otherwise specified, the phrase "Draft EIR" refers to the two documents, taken together.

The complexity of this project, including both the scale of the construction and the wide range of alternatives, has produced a Draft EIR which is not easy to read. Graphics and tables should be used for clarity and to allow comparison of the various attributes of each alternative. For example, some alternatives having certain traffic advantages may have construction phasing disadvantages.

The report and its appendices does contain an abundance of information and represents a good effort to offer as thorough an analysis of the alternatives as is possible within limits of time and funding. During the preparation of the Final EIR, the proponent's task is to assimilate the information developed and to select a preferred alternative which yields the maximum benefit of all the alternatives studied, with the least detrimental impacts.

Some commenters have complained that the Draft EIR presents a moving target. The concern is that while they review the impacts of Alternatives 1, 3, 3A, 5, 5A and 6 (as well as 2 and 4, discussed further below), the proponent is declaring publicly that the best option appears to be one of these, but is a refinement of Alternative 3A. The charges in the Draft EIR are that the proponent is changing its position on the connections to South Boston and alignment through East Boston are significantly different. The concern raised is whether the public and reviewing agencies are being afforded a fair opportunity to comment — during the Draft EIR stage — on the alternative which the DPW and EOTC actually propose.

I have carefully considered this concern during review of the Draft EIR. I find that, despite the difficulty of commenting when the refinement of Alternative 3A has not been fully studied in the report (and the documented alternatives are obsolete), the Draft EIR does meet EDA standards of adequacy as a draft environmental impact report. The alternatives which have been documented in the EIR all have flaws and impacts. It is an attempt to avoid these impacts, the proponent is studying the impacts of the alternatives and making design changes. The design modifications during the comment period on the Draft EIR is an efficient way of soliciting comment on whether they improve the project and reduce its impacts, or do not. Thus, the current review procedure is a valid use of the environmental review process. Although it requires a high level of effort from the public and reviewing agencies, as well as from the proponent, it has the potential for significantly improving the project, and I encourage it.

At the same time, however, I put the proponent on notice that the preferred alternative must be fully defined and adequately documented in the Final EIR. At that stage in the review process, the public and reviewing agencies are entitled to a precise definition of the project on which they are being asked to comment. The evolutionary process which has characterized the preparation of the Draft EIR is not the kind of process the Draft Supplement should be suspended at that time, so that the Commonwealth can focus on the preferred project and its alternatives and make a determination on implementation.

The critical elements to that decision will be a clear understanding of the traffic implications of the preferred Alternative, a clear understanding of the traffic implications of the alternatives, and each of the "Issues/Areas of Controversy." (p. xv6.)

The "Issues/Areas of Controversy" identify the major unresolved issues and are of critical importance. The list of issues is generally good, except as regards the Charles River Basin (see page 10 below) and except for the subject of fill disposal. However, the discussion of those issues — summed up in the declaration "All technical issues are addressed in the Report" (p. xvi) — is unacceptable. The Draft Report is so vast that the reader cannot find a value. Unfortunately, the Report does not deliver on this promise.

In the first place, the report fails to explain what is meant by "technical" issues and what the non-technical issues are. For instance, is location of west buildings (one such issue) technical or not? Then, where are the issues addressed? The index is no help and no page references are given. The report is so vast that the reader cannot find a value. The Final Report should contain clear and reasoned discussion of each point, not the sparse paragraphs scattered through the Draft Report and its appendices. There is need for more than simply improved organization of the report; the Final EIR needs the imposition of a coherent vision, a unifying and guiding intelligence which can bring order out of the welter of facts and issues in the Draft EIR. This requires a thoughtful analysis of the project and the issues, and a clear, reasoned, and useful synthesis of these issues. The Draft EIR, in its attempt to address the issues, has made a mistake in light of such treatment of these issues.

I am not expecting all such issues to be resolved in the Final EIR, especially matters relating to detailed construction impacts. However, all issues which can be resolved in the Final EIR should be resolved. The Draft EIR is so vast that the reader cannot find a value. The Final EIR should contain clear and reasoned discussion of each point, not the sparse paragraphs scattered through the Draft Report and its appendices. There is need for more than simply improved organization of the report; the Final EIR needs the imposition of a coherent vision, a unifying and guiding intelligence which can bring order out of the welter of facts and issues in the Draft EIR. This requires a thoughtful analysis of the project and the issues, and a clear, reasoned, and useful synthesis of these issues. The Draft EIR, in its attempt to address the issues, has made a mistake in light of such treatment of these issues.

An example of a major unresolved issue is the question of air-rights development. The EIR's discussion of such potential development is thoughtful and succinct. However, it leads to the conclusion that siting decisions for future air-rights development should be based on special foundations. However, the issues of air rights scale, density and barrier effects have enormous implications for the future design and scale of Boston's entire downtown waterfront.

The Supplemental DEIR contains two paragraphs (pp. 79-80) on how these very important decisions could be made. The Final EIR should describe in greater detail how the proponent proposes to proceed, to establish a decision-making process. The BMA has filed an interesting comment and proposal in this regard.

TRAFFIC

The Supplemental DEIR contains comparisons between the alternatives in terms of vehicle miles traveled (VMT) and vehicle hours traveled (VHT). The relationship between these criteria and their relative importance is not clear. The Final EIR should include a better explanation of the role of VMT and VHT in the selection of a preferred alternative.

One significant and quite surprising result was the percentage of ramps and links projected to operate at acceptable levels of service at peak hours (pp. 127, 128). For the no-build, 31% of ramps and links will operate at acceptable levels of service. For the build, 40% of ramps and links offer unacceptable service for the No-Build, while 40% of the ramps and links still provide unacceptable service for the Best Build alternative. This improvement appears surprisingly slight, for a \$2 billion capital project having top transportation priority for the next decade. Please comment on this issue.

Discussion of the Level of Service criterion should include a consideration of induced traffic. Will freeing up the Artery for better traffic flow on both the mainline and its ramps simply transfer more cars into Boston city streets, which have little capacity to handle new traffic? Could the net result be simply a shifting of congestion from one location to new locations?

On a regional basis, the issue of induced traffic has in the past engendered more opposition to a third harbor tunnel than any other issue. The difficult question which needs a clear response is this: will improved downtown highway capacity result in more vehicle trips to or through Boston, and stimulate downtown activities which generate new trips to the downtown? Similarly, what is the effect of increased highway capacity on the regional level? The Draft EIR does not address this question (other than to state that the capacity is "limited") as a result. Some of these questions are raised occasionally in the Report and Appendices, but the treatment is scant, given the importance of the issue. In the Final EIR, the discussion should be pulled together and expanded into one coherent section. The Final EIR should present figures sufficient to give a sense of the magnitude of induced traffic, and should place it in perspective against existing traffic patterns. The Draft EIR does not do this. It also fails to discuss the factors which contribute to induced traffic, and provide estimates of its sources (diversion of existing and future trips; creation of future trips). The goal of the discussion should be to provide a further basis for reaching a sound decision among alternatives.

A. TRAFFIC STUDY AREA

The Draft EIR assumed much too large a study area, with a daily traffic highway grid covering an area encompassing everything within Route 128 (10 mile radius) and a 3-mile radius for the AM Peak and PM peak periods. Such a large area should be utilized only when computer prediction models have proven themselves accurate and useful for study areas so extensive. The Draft EIR has been notable for inaccurate results and lack of credibility or usefulness.

B. QUALITY TRAFFIC COUNTS AND TRENDS

The EIR contains a partial listing of 1982 traffic figures (Tables 41, 42, 43), but unfortunately does not present a flow diagram for daily and peak PM figures. The listing of traffic counts is not useful for either calibration runs of the model. Additional data should be provided on Central Artery and Southeast Expressway counts for all ramps and mainline sections. The Appendix should show growth trends (1960-1982) and variations at key locations, as well as hourly traffic volume by hour of the day.

The traffic volume should be presented in a complete diagram or chart form, as has been done in earlier Corridor Planning Study reports. The Tables used in the report are incomplete and hard to read: numerous key ramps are not included, particularly in the Charleston and Broadway area. All roadway links should be shown in the Charleston, City Square and Leverett Circle areas.

C. EXISTING CAPACITIES AND CALIBRATION

The EIR notes that the model was calibrated. However, a table should be presented for the calibration results — showing actual traffic counts and model predictions for a representative series of links and ramps in the Central Artery corridor. An error analysis should be presented. The calibration results should be compared with the capacity estimates. Modeling accuracy in the EIR should be compared with previous modeling efforts, such as the BTPS study.

Table 36 in Appendix 4 (Traffic) presents a summary of 214 roadway links and intersections (AM or PM) for existing traffic flows, and 35 of links and intersections (AM or PM) for capacity estimates. The table lists volume, capacity, and the ratio of volume to capacity. The table also lists the volume measure or the capacity estimates. A chart should be prepared showing the calculated capacities of the Central Artery and Southeast Expressway mainline and ramps.

Table 35 lists various traffic counts and projections, with indicated accuracy in the range of 25 to 50 vehicles per hour. The table also lists the intended conclusion. If not, what level of accuracy should be assumed?

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D. CAPACITY OF ALTERNATIVES

A chart should be provided in the Final EIR illustrating the estimated capacity improvements used in the EIR for each of the alternatives. The chart should show the capacity improvements and related capacity additions which will be constructed independently of the Central Artery/Tunnel project should be specified.

The Supplemental EIR makes a very significant advance in transportation planning and analysis — because of the emphasis on bottlenecks and flow constraints. This concept provides for better understanding of the capacity of the Central Artery and the capacity of the Central Artery and Southeast Expressway and illustrates what improvements would result from future build alternatives. The empirically-based queuing analysis developed by CTS also provides a useful and much more credible technique to assess the nature of future vehicular flows on major arterials.

Some of the queuing results are questionable, in particular the southeast section of the Central Artery. The Supplemental EIR (Figure 33) indicates that significant queuing does not currently exist, while typical observation suggests that queues in the PM peak are fairly continuous from Columbia Road to the ramp merge of the existing tunnels and the Southbound Central Artery.

A chain is also no stronger than its weakest link, and the technique summarized on page 26 of Appendix 4 is not a fair presentation of how traffic flow might be improved. The key factor is not the number of bottlenecks (whether large or small) but instead is the location and severity of the key bottleneck. If this bottleneck occurs on the Central Artery or Southeast Expressway, then problems are likely to continue on local streets which will be subject to traffic diversions around expressway delays.

The Appendix volume should contain the capacity calculations used for estimating the capacity limitations of key bottlenecks on the Southeast Expressway, at Bell Circle and at Leverett Circle.

E. OTHER CAPACITY FACTORS

Some evidence in the Boston area indicates that since the mid-1970s, peak hour traffic volumes at congestion points have increased 10-15%. The likely reason for this increase appears to be the shift to smaller cars and the consequent increase in vehicle density on the roadway.

F. NEW DEVELOPMENT

The EIR has projected new development and new demand for the movement of people in the Boston area. This growth represents a combination of trends, plans and hopes, and ultimately produces a travel demand — which may or may not be accommodated by the transportation system. The idea output of the EIR should be a conclusion as to whether or not the projected new development can be accommodated by the capacity of the various alternatives. As noted below, the EIR fails to achieve this goal.

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G. MODAL SPLIT AND RIDER SHARING

The computer model assumed that modal split was a constant, because the base data dealt only with vehicle trips. Therefore, the EIR is not sensitive to any events or policies which might shift tripping from auto to transit or vice versa. The realism of this assumption should be discussed in the Final EIR.

Was there any allowance for increased rider sharing in the use of vehicles destined for downtown, or did the computer model assume a fixed number of riders per car?

H. PEAK SPREADING

In recent years, the Central Artery has produced a "flatter" peak period of traffic flow, with high traffic volumes spreading to the mid-afternoon and early evening hours. The EIR sought to accommodate this situation by making 3-hour peak period projections, with the peak hour handling 37-38% of the 3-hour total.

Evidence suggests that the flow peak may be closer to four hours in duration, with a noticeable "level of Service F" effect in the afternoon peak hours. Numerous ramps and sections of the Central Artery show a lower volume of vehicles moved during heaviest congestion periods, and higher flow volumes during adjacent hours when congestion is not as severe. In other words, the expressway system becomes so overloaded that it does not work as efficiently as it should. The only way to increase the number of vehicles moved is to increase the peak period. The peak period must be extended to accommodate and new travel demand, the peak period must be extended dramatically to provide for increases in actual vehicle flow.

Therefore, the Final EIR should define what three hour PM peak period was used and how the "peak hour" was defined in the computer model. Because of the orientation effect, the peak congestion hour on the Artery is usually the middle of the 3-hour period. The EIR should show the 3-hour total, rather than the 37% figures utilized in the computer modeling.

I. COMPUTER MODELING ASSUMPTIONS

The use of a fixed trip table and the inflexibilities associated with it should be questioned in the Final EIR. What is the mechanism within the computer model that allows the computer to assign trips to congested routes which are already at Level of Service E capacity?

The directional distribution of vehicles to key downtown locations, such as Government Center, North Station and other areas such as South Boston development sites should be presented generally, to indicate the potential for utilization of expressways or local streets.

If local streets are less congested with some of the Build alternatives (as the Draft EIR asserts), yet major bottlenecks remain on the Southeast Expressway, will there be a tendency for expressway congestion to spill over onto local streets?

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The Fixed-Trip Table and real-world capacity constraints do not appear to be compatible. The EIR model provides a measure of relative demand over different routes and for different alternatives. Unfortunately, the results are presented in the form of "traffic volumes", which is a highly ambiguous reference capable of misinterpretation both within the EIR and by its readers.

The traffic "volumes" referred to in the report are in actuality (semi-constrained) demand volumes, in contrast to real world traffic counts which represent flow volumes. This confusion continues throughout almost the entire EIR and must be clarified in the Final EIR. In particular, it is wrong to assign a traffic speed to demand volume when capacity is not constrained. The effect of congestion is to increase severely capacity. The effect of congestion is to increase severely capacity. The effect of congestion is to increase severely capacity.

J. RESULTS

The credibility of the EIR results is a problem because of the presentation of demand predictions rather than flow predictions. How can air pollution, noise and traffic diversions around bottlenecks be properly assessed using hypothetical demand figures?

The improvements credited to the Build alternatives do not appear evident from Table 40 in Appendix A. Level of Service predictions are presented for minor improvements in the length of congestion periods, with a reduction in tunnel congestion from 16 hours a day to 1 hour a day for the new tunnel alternatives. However, congestion on the Southeast Expressway would be increased from 13 hours to 17 hours a day, which indicates that congestion could occur for a continuous period from 5 AM to 10 PM. However, this condition is not supported by the southbound queuing conditions shown in Figure 18 on page 99 of Appendix 4 of the original Draft EIR.

K. BALANCED TRANSPORTATION

The proposals for building a Third Harbor Tunnel and widening the Central Artery represent higher priorities to solve urban transportation problems. By contrast, the common priorities in the 1970s were on mass transit construction and on not using highway construction as an ultimate answer for urban congestion and air pollution. While the catchword of the 1970s was "balanced transportation" with the major emphasis on mass transit, should more emphasis in the 1980s be on a truly balanced transportation strategy, whereby transit and highway capabilities can be accurately gauged and selected?

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Is it reasonable to expect any highway or transit strategy to put an end to congestion? Is the real future we are facing a question of simply dealing with the degree or duration of congestion and where the bottlenecks will be located? These questions related to the matter of induced traffic and the tendency of urban transportation facilities which offer good service to attract patrons until they become overloaded and the quality of service declines.

If the ultimate result is to decrease congestion somewhat or to allow more people to be moved with the same level of congestion and delays as we currently encounter, how can these expectations be fulfilled in a public document such as an Environmental Impact Report? In particular, what is the effectiveness of various efforts in either the highway, rail, transit or mixed modes (bus transit, light rail, commuter rail, etc.) to reduce congestion? For any given expenditure, the transit mode should be capable of expression in terms of "reduced-annual-hours-of-delay, per dollar" and/or "additional-annual-trips, per dollar". The effectiveness of improving mass transit can also be estimated for some of the transit improvement alternatives, using similar measures. Alternative proposals would be the extensive purchase and operation of additional Red Line trains to Quincy and Airport, with the resulting reduction in shorter headways and the use trips generated by more service.

Measures of this sort should be discussed in the final EIR as a way of getting a better handle on what form balanced transportation should take in the Boston downtown and Southeast corridor.

L. RAPID TRANSIT MITIGATION

Service on the Red Line has deteriorated badly in recent years, with many former riders switching back to their autos, despite the heavy congestion in the Southeast Expressway corridor. The Red Line is car-limited and has suffered an increase in missed trips due largely to the unavailability of trains. With the extension to Airport in 1988 and the opening of the new South Shore station, the Red Line will carry more than 100,000 passengers daily. Difficulties on the Red Line will be reflected by more auto travel along the South Shore and into downtown Boston.

The Final EIR should discuss transit strategies and alternatives which would complement the highway proposals in the Central Artery and Tunnel proposals. The present 3-minute headways to 1.5 or 2 minutes, rather than the 4.5 minute headways resulting from the future introduction of 6-car trains.

Another option is the novel use of ferry service to provide for new waterfront activities, as well as shuttle movements between developing areas in South Boston and downtown. The City of Boston should be encouraged to support a stable demand for water-based transportation around downtown Boston.

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N. CONSTRUCTION IMPACTS ON TRAFFIC FLOW

The development of staged construction techniques for the depression of the Central Artery is a very difficult process which cannot be completed in the regular EIR process alone. EITC commitments to provide detailed supplementary information on how the Artery will be constructed, on what time schedule and with what impacts should be expected are very important elements in the overall public process of developing awareness of the project and its impacts. The state of the project and its impacts should be discussed in the EIR. The state of the project and its impacts should be discussed in the EIR. The state of the project and its impacts should be discussed in the EIR.

The two most difficult areas for traffic maintenance in terms of unresolvable impacts are the maintaining 5-year of expressway flow over the vertical traffic restrictions and the maintaining of the elevated viaduct at High Street, and the ramp connections to and from Lavett Circle. The relocation of utilities may also present special problems for the maintenance of traffic.

The Final EIR should include a listing of any ramps which would be closed, longer than segments, and what traffic volume they currently carry. These variables, alternate routes and traffic handling strategies should be presented.

N. HAZARDOUS CARGOES

Routing of hazardous cargo vehicles should be discussed in more detail, particularly in the context of the proposed construction. The use of hazardous cargo vehicles be handled during construction? Is it possible to use the southbound Bay Square off-ramp rather than the High Street off-ramp for tank trucks?

IMPACTS ON THE CHARLES RIVER BASIN

The Depressed Artery project could have a very major impact on the Lower Charles River, and regrettably the SDIS treatment is quite sparse. Not until Figure 226 of the Supplemental Engineering Document does it appear that the Lavett Circle ramps from the Central Artery will pass over the Charles River. The project will have a major impact on the Hospital. Whether 1 more staff has been able to locate the Hospital, discussion of the issue, either in the main volume or any of the Appendices (although filling is briefly referenced on page 240).

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This defect suggests a lack of communication between various members of the consultant team. While the engineering group concluded that the ramps would have to be constructed in the Charles, how much awareness was there of this issue among the consultants who prepared the Water Resource section, the Historic section or the Parkland/Section 4(f) section? Furthermore, there are already two plans for developing land use in the area: the Charles River Basin Plan, which includes the island with the dam, and a nearby new area, and the MDC Master Plan for park development in the area.

The ramping around Leverett Circle has long-range implications for the riverfront and future potential for extensions of the Charles River Bridge. It also presents major problems of design, flow and safety. The ramping around the bridge is a major problem. The new Storrow Drive with four lanes of traffic apparently funneling into two lanes immediately downstream of these merges is an awkward weaving section on outbound Charles Street, with a left-handed exit to Charles Circle. The design and functioning of these ramps must be clearly explained in the Final EIS, and a careful traffic analysis of the area should also be provided to compare existing and future traffic flow conditions.

A graphic rendering should be provided of how the new ramping would appear in the Leverett Circle area and what would be the impacts on the river and park development potential. Any filling of the Charles River or Boston Harbor in this area -- whether temporary or permanent -- should be clearly delineated. The Engineering Report appears to indicate that it will involve construction 60-80 feet into the Lower Basin and 120 feet into the Harbor, below the new dam, plus additional temporary filling.

Some of the reasons I am concerned for the impacts along the Lower Charles River are:

1. The MDC's Charles River Reservation is one of the greatest alterations of the riverfront since the construction of the old dam (now the Science Museum). A plan exists, and legislation has been passed, to extend that park system down to the new dam (on both sides of the River), and beyond to the North End and the Harbor. The Leverett-Storrow ramps, and relocated Lowell Street, might be a permanent barrier to implementation of that plan.
2. The Charles River National Register District extends down to the site of the old dam. I surmise that the portion down to the new dam might be deemed eligible; if not, it is nonetheless an important historic link between the basin and the Harbor.

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3. The Lower Charles Basin is clearly a navigable waterway. U.S. Army Corps of Engineers, possibly Coast Guard, and USACE Veterans and Veterans Affairs are the jurisdictional agencies. If the Corps and USACE are not involved, the Corps is not involved in the lower basin, those agencies cannot be expected to comment on whether the filling would be permitted. (In the absence of their comments, I must say that to me, filling of the Charles River Basin verges on the unthinkable.)

4. The new Charles River dam is a pre-emptive structure, a structure that will have an impact on the riverfront. The new low-level bridge will have an unavoidable adverse impact on it and the Lower Basin. (Much remains to be done in engineering and design to minimize this impact.) The ramp design, and alternatives, must be painstakingly explored, so that its impacts can be avoided or minimized.

5. Despite the EIS's claim that Leverett Circle is retained as a valve to modulate traffic flow into Storrow Drive, the Supplemental Engineering Report plans seem to show a scheme which would bypass Leverett Circle. In addition, the surface street and ramp design at Leverett Circle is incomprehensible. A great deal of further work is needed to come up with a scheme which is rational and workable. The EIS's claim that the new dam will be a barrier to the North Station Urban Renewal area, the MTA and the MDC.

FILL DISPOSAL

The Final EIS should contain a section on handling and disposal of excavated materials. The EIS should contain a section on the amount and characteristics of such and be less general about issues of handling, storage and disposal. I understand that the total amount of material is between three and five million cubic yards. For reference, one million cubic yards would cover an area the size of a football field to a height of seventy stories. To simply say, as does the Draft, that the clay could be used as cover for southeastern Massachusetts landfills is to significantly underestimate the magnitude of the disposal problem.

This in turn leads to the question of why the depressed artery needs to be so deep. Since it passes above the MTA tunnels, I cannot see any real justification for depressing it as low as is shown. If it is to be at that depth, then the area above it should perhaps be put to other use (crutch route, parking) rather than being backfilled. Building it closer to the surface would seem safer for all sorts of reasons. Any use of the area above the depressed artery would be a major improvement in the area. The EIS should discuss the problems. If, however, the full depression and backfilling is required, can any of the spoil be used as backfill? If so, where can it be stored while awaiting re-use? If not, how much backfill is necessary, and what is its availability?

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DREDGE SPOIL DISPOSAL

Both State and Federal Regulations favor upland disposal of dredge spoils where feasible. Since a large part of the spoils may be uncontaminated, a plan to reuse this material would be preferred.

ALTERNATIVES 2 and 4

These alternatives were documented in the original Draft EIR, dated December 1982. They involved tunnel alignments from the Fort Point Channel across to the main Central Alignment in East Boston. During scoping of the Draft EIR, the Federal Highway Administration and the Secretary identified one of their belief that the impacts of these alternatives were unacceptable. Other alternatives under study were unacceptable. Based upon review of the Draft EIR and Supplemental Draft EIR, I concur with their finding, and for purposes of Massachusetts Environmental Policy Act compliance, little more than a reiteration of their conclusions is required to adequately deal with Alternatives 2 and 4.

COMMENTS

In view of the complexity and breadth of the Report, and of the relatively small number of comments submitted to this office (many more have been sent to MOPW and FHWA), I am making no attempt to discuss the comments in detail. Comments are being referred to in the final EIR as required by law. For the record, comments have been formally submitted to me for transmittal to the proponent by:

DDOE
Coastal Zone Management
Boston Redevelopment Authority
Boston Air Pollution Control Commission
NAPC
EDMC
Boston Tea Party

I have reviewed all other comments of which copies were sent to me.

I am pleased that the Report contains an index. The index in the Final EIR should be more comprehensive, and cover the Technical Appendices and Supplemental Reports as well as the main volume.

August 29, 1983

Date

James S. Ward
JAMES S. WARD, SECRETARY

RESPONSES TO "THE CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS ON "THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT REPORT" (August 29, 1983)

160. We agree that the scale of the project, the wide range of alternatives, and draft and supplemental draft documents, each 12 volumes in size, is a formidable review task for any reader. In the FEIS/FEIR, additional tables and graphics (especially in Sections 4.4.4 Joint Development and 4.16 AESTHETIC IMPACTS) have been used to clarify and simplify the presentation of impacts. In addition, the FEIS/FEIR will be simpler to read and compare the attributes of the Preferred Alternative to the other alternatives studied because of the following features:

- Detailed presentation and comparison of the Preferred Alternative's impacts is made only to the No-Build Alternative.
- For each impact category, however, summary comparison of the impacts of all alternatives is made as an introduction to each impact section.
- The SUMMARY to the FEIS/FEIR contains a simple tabular comparison of all the major impacts of the Preferred and prior DEIS/DEIR and SPEIS/SDEIR alternatives.

In addition to these improvements, the FEIS/FEIR also includes in Section 1.0 INTRODUCTION an explanation of the Commonwealth's transportation policy decisions and how these decisions affected the selection of the Preferred Alternative (see Section 1.3 MAJOR POLICY ISSUES). Section 2.4 REASONS FOR NOT SELECTING OTHER EIS ALTERNATIVES summarizes the reasons why the other alternatives were rejected in favor of the Preferred Alternative.

161. The traffic implications of the Preferred Alternative are detailed in Section 4.2 TRANSPORTATION, including a summary comparison with the other alternatives. Appendix 3: TRAFFIC also contains additional queuing and bottleneck analyses performed by the Central Transportation Planning Staff for the Preferred and other alternatives, and detailed documentation of the projects effects on mode choice for access to and through the downtown area. Overall summary impact comparisons for all alternatives are contained in the introductory subsection of each impact section in Section 4.0 ENVIRONMENTAL CONSEQUENCES. See response to Comment No. 162 (below) for status and additional discussion on each of the "Issues/Areas of Controversy."

162. As suggested in this comment, cross-referencing of "Issues/Areas of Controversy" and "Significant Unresolved Issues" in the SUMMARY of the FEIS/FEIR is included under both these headings to the appropriate sections of the FEIS/FEIR where they are discussed. With respect to DOE's determination that a coherent, unifying guidance is necessary in the FEIS/FEIR and of the decision making process, Chapter 1.0 has been revamped to overview the whole decision making process and to attempt to place major issues and areas of controversy, addressed in this FEIS/FEIR, in their proper perspective.

As is aptly pointed out by DOE, several issues identified in the SUMMARY went beyond being merely technical (i.e., subject of public controversy). For this reason, the term "technical" issues was dropped in the introduction to the FEIS/FEIR SUMMARY. Issues/Areas of Controversy section, as it is not relevant to the intended purpose of presenting both "technical", "non-technical", and "mixed" issues in that section.

The FEIS/FEIR, for each category of impact, identifies those issues (impacts) which are unresolvable (unavoidable), which can be mitigated by appropriate project features, or which will be addressed further, for resolution during the next (design) phase of the project. Several of these issues have been specifically identified by the FHWA as requiring additional engineering and environmental study during preliminary design to further identify, and mitigate if possible, adverse impacts. These issues to be studied further are as follows: Fabrication Site (if applicable); Joint Development; Dredged and Excavated Material Disposal; Parking Impacts; Construction Impacts (traffic, air, noise); Ventilation Building Location and Height; Leverett Circle Connector; Resolution of North Station/Charles River Basin Area Conflicts; Phase II Archaeological Survey and Final Mitigation Details; Construction Staging and Sequencing of Project; and Relocation Impacts. The appropriate process which will be utilized by the Commonwealth to bring about resolution of specific issues during design will vary with the specific issue or impact. However, the Commonwealth is committed to seek resolution of these issues utilizing the following mechanisms:

- (a) Further and more detailed engineering evaluation and project refinement during design.
- (b) Additional environmental study in sensitive or difficult environmental areas, which includes the Commonwealth's commitment to document further construction period staging impacts. It also includes Phase I, Step 2 and Phase II archaeological surveys as required by the Section 106 Memorandum of Agreement and the other issues identified by the FHWA.
- (c) Ongoing close agency liaison with affected federal, state, and local agencies, including environmental permitting agencies (e.g., U.S. Army Corps of Engineers, DEQE, and Boston Conservation Commission), the MDC, Massport, and the City of Boston.
- (d) Ongoing public/community participation at the neighborhood level and with affected private interests.

163. The major issue of air rights development is one key area where the FEIS/FEIR describes the specific process by which the Commonwealth proposes to achieve issue resolution during the design phase. This issue has also been identified by the FHWA as requiring further study during preliminary design. As described in detail in Section 4.4 Joint Development, it includes an open participatory process involving the Commonwealth, the City of Boston, and affected parties, including the community and business interests. With reference to the BRA's approach to this project, mentioned by BOEA in its Certificate, see responses to the BRA's written comments (Nos. 287-321). In summary, the BRA letter outlines a thoughtful development process and series of work products during the design/development phase. Section 4.4.4 outlines a similar process which the Commonwealth proposes to follow, with details to be developed in ongoing dialogue with the City of Boston and other affected parties. With regard to special foundations for air-rights development, the depressed Central Artery structure will be capable of supporting buildings of several stories in height without special foundations being required. The FEIS/FEIR section on joint development reflects both consideration of foundation supports and scale density and other characteristics of potential joint development opportunities which would make it compatible with adjacent downtown and waterfront areas, and the North End and West End neighborhoods. More detailed analysis of these joint development opportunities, especially individual site issues, will occur during the preliminary design phase.

164. Both VMT and VHT were major determinant variables in the selection process. The relationship between these criteria and a comparison of VMT and VHT among alternatives is contained in Section 4.2.6. See Section 1.1 and Section 2.4 for discussion on the role of vehicle miles traveled (VMT) and vehicle hours traveled (VHT) in selecting the Preferred Alternative.

165. As the SDEIR/DEIR pointed out, design refinements for several of the Central Artery ramps and intersecting streets (e.g., two-lane ramp, surface street turnarounds) were incorporated into Alternative 5A Modified subsequent to SDEIS/DEIR publication to improve or eliminate unacceptable (LOS F) traffic operating conditions. These design refinements were also applicable to SDEIS/DEIR Alternatives 3A, 5A and 6, and are part of the "moving target" which BOEA speaks of on page 2 of its Certificate. The result is improvement in acceptable levels of service (and hence reduction in unacceptable levels of service) for the Preferred Alternative beyond the levels achieved for Alternatives 3A, 5A, and 6. These design refinements would also improve levels of service for Alternatives 3A, 5A, and 6, during the worst case 2010 AM peak hour but not as significantly as for the Preferred Alternative, as shown in the attached table:

2010 AM PEAK HOUR HIGHWAY/RAMP LEVELS OF SERVICE BY CATEGORY (expressed as a percentage of total existing and project links and ramps)						
LOS	Preferred Alternative		Alternative 3A		Alternative 5A	
	SDEIR	W/REFINE	SDEIR	W/REFINE	SDEIR	W/REFINE
A - D	-	71	60	63	60	62
E	-	14	10	12	13	15
F	-	15	30	25	27	23
TOTAL	-	100	100	100	100	100

As indicated, the Preferred Alternative increases the number of highway links and ramps operating at acceptable LOS A-D levels from the maximum SDEIR level of 60 percent (Alternatives 3A and 5A) to 71 percent. In terms of intolerable, LOS F, conditions, only 15 percent will operate in that range (as compared to 27 percent for the best case, SDEIR Alternative 5A); 14 percent of the highway links and ramp sections will operate in the unacceptable (capacity) range (LOS E). Combined LOS E-F operation improves from 40 percent for SDEIR Alternatives 3A and 5A with refinements to 29 percent for the Preferred Alternative. As discussed in Chapter 1.0 INTRODUCTION and Section 2.2.2 Summary of Benefits, the Preferred Alternative will result in the creation of 17.6 million person hours a year of travel time savings. It is a major improvement in the region's highway network.

166. See Section 1.1 MAJOR POLICY ISSUES for a brief discussion of the implications of a depressed Central Artery and a Third Harbor Tunnel on inducing traffic on downtown streets and to Logan Airport. See Section 4.2 TRANSPORTATION for the specific impacts of induced traffic on the regional roadway system. As indicated in the FEIS/FEIR, the Preferred Alternative is not expected to "induce" traffic to the Boston area. A fixed number of future trips to and from the area is assumed in the future, with or without the project. The initial small diversion of transit trips to the improved highway facilities is generally offset by inclusion of the exclusive bus ramps to the Airport from South Station. The improved bus connections will attract many as many riders as were diverted from the transit system before inclusion of the exclusive bus ramps (see Section 4.2.3 Other Transportation Facilities in Appendix 3: TRAFFIC).

167. The extents of coverage of the Average Weekday Daily Traffic (AWDT) network and peak period network were established to ensure that they included the areas of effect of the proposed project, a specific concern raised during the MPA scoping meetings, including induced and diverted traffic. Since the proposed project has regional traffic implications, the networks were regional in scope. The primary study area was much smaller. For traffic purposes, it extended from the Columbia Point interchange on the Southeast Expressway to the Central Artery's High-Level Bridge interchange with Storrow Drive, Interstate Route 93, and Route 1 (Mystic-Tobin Bridge). It also extended across the harbor into East Boston and northward along Route 1A to Bell Circle in Revere. Approximately 100-125 key roadway link and ramp sections and intersections were analyzed within this traffic study area, a very small proportion (one to two percent) of the total roadway links and nodes on the regional assignment networks. See also response to EOEa Comment No. 183 below.

168. Traffic flow diagrams for the Southeast Expressway/Central Artery, from the Columbia Road interchange to the High-Level Bridge interchange with Interstate Route 93 and Route 1 (Mystic-Tobin Bridge) in Charlestown, are contained in Figures 1, 2, and 3 of Appendix 3: TRAFFIC, as requested by EOEa. These figures are actual traffic volumes derived from traffic counts conducted between 1977 and 1982. Growth trends for the past 20 years was not a scope item in the Scope issued by the Secretary of Environmental Affairs. As agreed by EOEa, growth trends at key Artery locations will be provided by the Commonwealth in later traffic report documentation subsequent to publication of the FEIS/FEIR.

169. As agreed by EOEa, a table of calibration results and an error analysis of calibration results will be provided by the Commonwealth in later traffic report documentation, subsequent to publication of the FEIS/FEIR.

170. In terms of flows per hour, "practical capacities" will be exceeded, but the primary phenomenon which will occur is the "spreading of the peak", which means that more cars will be carried during the preceding and succeeding hours, with a lower volume than that reported during the expected peak hour.

171. As agreed by EOEa, a chart has been prepared containing calculated capacities of selected highway links and ramps on the existing Central Artery and Southeast Expressway, and the tunnels, and is contained in Table 1 of Appendix 3: TRAFFIC. The capacities contained in this table are theoretical capacities computed on the basis of Highway Capacity Manual procedures. All are link and ramp capacities, with the exception of the Sumner and Callahan Tunnels, whose capacities were computed at the restricting point (merge point) of traffic entry to the tunnels. A complete chart of all Expressway/Artery link/ramp capacities will be contained in later traffic report documentation provided subsequent to publication of the FEIS/FEIR.

172. The intended conclusion was not to suggest that the traffic counts and projections were as precise as one percent or less. The numbers appear as they do as a result of rounding (to the nearest 25 vehicles). The level of accuracy of the traffic counts is not exactly determinable, because of a lack of alternative counts for the same time period for comparison. However, with proper functioning of the Automatic Traffic Recorders (ATRs) from which the counts were derived, counts accuracy within five to ten percent is believed to be realized. For the traffic forecasts, model calibration (to existing counts) provides a measure of the level of accuracy, which will be discussed in the later traffic report documentation, subsequent to publication of the FEIS/FEIR.

173. As agreed by EOEa, a chart has been prepared containing calculated capacities of selected highway links and ramps on the Southeast Expressway and Central Artery, and the tunnels, for both the No-Build Alternative and the Preferred Alternative, and is contained in Table 1 of Appendix 3: TRAFFIC.

174. Chapter 5.0 QUEUES AND DELAYS ON EXPRESS HIGHWAY FACILITIES in Appendix 4: TRAFFIC of the SDIS/FEIR has been included, and expanded to address all alternatives, including the Preferred Alternative, in Chapter 2 of Appendix 3: TRAFFIC of this FEIS/FEIR.

175. The southbound PM peak queue on the Southeast Expressway referenced by EOEa on page 6 of its Certificate was outside the study area examined for mainline bottlenecks (downstream of Columbia Road), and therefore not considered by CTPS, even though queues and congestion downstream might extend into the area. See Chapter 2 of Appendix 3: TRAFFIC of this FEIS/FEIR for further discussion.

176. As requested by EOEa, capacity calculations used in estimating capacity limitations of key bottlenecks on the Southeast Expressway, at Bell Circle, and at Everett Circle have been included as Exhibits in Chapter 1 of Appendix 3: TRAFFIC of this FEIS/FEIR.

177. We agree that the likely reason for increases in peak traffic volumes at congestion points of the magnitude of 10-15 percent may be due to the shift to smaller vehicles, and consequently increased vehicle densities. Traffic counts and trends for the Central Artery's High-Level Bridge bottleneck for recent years seems to bear this contention out.

178. Section 1.3 Major Policy Issues of the FEIS/FEIR addresses the relationship between travel demands produced by projections of new development and the capacity of the proposed project to meet these demands. It is fair to summarize the result of this work as suggesting that the no-build network may be incapable of accommodating demands created by planned new development. The Preferred Alternative has greater carrying capacity intended to accommodate increased traffic from future development.

179. The sensitivity of the vehicle trip estimates used in this EIS/FEIR process to mode split and ride sharing is discussed in Sections 1.3 Major Policy Issues and 4.2 Transportation of the FEIS/FEIR. The model was sensitive to different mode split and ride sharing characteristics for Logan Airport trips, between the No-Build and Build alternatives. As noted in the FEIS/FEIR, the forecasting assumes a fixed number of person trips in the area being made by a variable number of vehicles. As capacity increased, average auto occupancy rates decrease. This issue is also discussed further in Appendix 3: TRAFFIC; more detailed presentations of this information will be provided in later traffic report documentation subsequent to publication of the FEIS/FEIR.

180. The three hour peak periods utilized in the computerized traffic assignment process were 7 AM to 10 AM for the AM peak and 3 PM to 6 PM for the PM peak. No specific, single peak hour was defined in the computer model; a peak hour factor was manually applied to the peak three-hour assignment to derive single, highest peak hour values. EOEa points out on page 7 of its Certificate that because of the overloading effect, traffic volumes during the peak congestion hour may be 33 percent or less of the three hour peak rather than the 37 percent value used in the EIS/FEIR to estimate the single highest peak hour. This may be true and if so, reflects the fact that the PM peak hour peak hour volumes, v/c ratios, and levels of service are on the order of 1.0.

(high) side. EOEa appears to suggest that spreading of the three-hour peak into more of a 3-1/2 to 4-hour peak may occur because of this same reason. If this is true, then eight-hour volumes derived in the PEIS/PEIR in a similar fashion, using manually applied factors, are also on the conservative (high) side. The implications of peak period spreading are exemplified by the estimated number of hours of congested operations on the regional highway facilities, particularly for the No-Build Alternative, where unacceptable LOS E or F conditions would occur for up to 14 hours per day in the year 2010.

Peak hour spreading (congestion) on major routes is described in Section 4.2.4 Central Artery Bottlenecks and Congestion Points of the PEIS/PEIR.

181. The implications of the computer modelling assumptions on the traffic forecasts contained in the PEIS/PEIR are generally addressed in Sections 1.3.1 through 1.3.3 Major Policy Issues, and in Section 4.2.5 Issues Concerning Traffic Forecasts of the PEIS/PEIR. As agreed with EOEa, more detailed descriptions of the computer modelling assumptions and methodology, and responses to specific EOEa questions in that regard, will be provided in the later traffic report documentation subsequent to publication of the PEIS/PEIR. See also response to Comment No. 183 below.

182. Section 4.2 of the PEIS/PEIR contains a statement clarifying the fact that the term "volumes" in the text for future traffic conditions refers to demand volumes. The statement is as follows:

"Unlike existing volumes, which are based on actual manual and automatic traffic recorder counts, future traffic volumes are 'demand' volumes. These demand volumes, in some cases, exceed service or actual volumes that will occur at individual roadway locations. Where demand volumes are lower than capacity, they represent anticipated traffic flow conditions; where demand volumes exceed the ability of a roadway to handle them, the implication is that peak hour congestion will spread into earlier and later hours of the day. The higher the demand volume to capacity ratio, the longer peak congestion will prevail."

We disagree with EOEa that it is wrong to assign a traffic speed to a roadway section which has a demand volume-to-capacity ratio in excess of 1.0 and LOS F conditions. The Highway Capacity Manual and other traffic manuals define average operating speeds for LOS F conditions: for a highway section, these average speeds are typically less than 25-30 MPH and greater than 0 MPH (no traffic movement).

183. As noted throughout in these responses to EOEa comments, we concur that there are some inherent limitations involved in the use of the traffic forecasting data; on the other hand, it should be noted that the FHWA/UMTA UROAD traffic assignment process used represents the available state-of-the-art in traffic assignment procedures. The process does explicitly take into consideration the phenomenon of travel speeds which asymptotically approach zero as overloading of the link occurs. As a cross check to this model, this SIS resulted in the creation and application by EOEa of a refined modeling procedure to analyze what happens when traffic flow breaks down and speeds approach zero. That work tends to come to the same conclusions as the UROAD package, concerning the relative performance of each option in the congestion state. The queue model output tends to support the validity of the UROAD model output.

A discussion of a policy implication of the possible limitations of the forecasts is presented in Section 1.3.4 Traffic Forecasting Methodology, Section 4.2.5 Issues Concerning Traffic Forecasts.

184. We believe that the hours-of-congestion increase on the Southeast Expressway at Southampton Street for the build alternatives vs. the no-build is a reasonable approximation of the anticipated effect of increased traffic on the Southeast Expressway southbound between Columbia Road and the Southampton Street ramps. In Appendix 4: TRAFFIC of the SDIS/DIR, Table 39 showed increases in AMPT (both directions) on this section for all build alternatives as compared to the No-Build Alternative; Tables 41 and 42 respectively showed increases in southbound AM and PM traffic volumes on this section. The finding that daily congestion will increase from 13 hours to 15-17 hours on this southbound Expressway section is consistent with the available data. We do agree, however, that it is inconsistent with the mentioned SDIR and DIR Traffic Appendix queuing figures. For Figure 36 on page 100 of Appendix 4 of the SDIR, as mentioned in responses to Comment No. 174, the potential peak hour queue through this section was not computed by CTRP, hence the reason for the apparent inconsistency. For Figure 18 on page 99 of Appendix 4 of the DIR, a southbound 2010 PM peak hour queue extending north to the Southampton Street on-ramp is shown, which is approximately the same length as the No-Build Alternative's southbound 2010 PM peak hour queue. This reflects consistency in terms of existence of the queue, but some inconsistency in terms of a longer queue not being shown for the build alternative. Table 51, page 62, of SDIR Appendix 4 does, however, indicate increases in queue lengths at the Columbia Road on-ramp for Alternatives 3A and 6, with the same queue lengths for Alternatives 1, 5, and 5A as compared to the No-Build Alternative. Inconsistency also may be a result of the accuracy of the queuing methodology utilized, which has been discussed with EOEa on previous occasions. However, it is also suggested that the two measures, (1) daily hours of congestion and (2) PM peak hour queues do not necessarily have a one-to-one correspondence. Daily hours of congestion is computed across all hours of the day, not just PM operating conditions, and is based on LOS E and F operation, while the peak hour queues are based on LOS F conditions (approach volumes at a bottleneck exceeding the capacity of the bottleneck). Therefore, while they are related measures, they are also two distinctly separate measures.

185. A discussion addressing EOEa's comment on a balanced transportation strategy is contained in Section 1.3.1 MAJOR POLICY ISSUES of the PEIS/PEIR. See also Appendix 3: TRAFFIC regarding the effectiveness of transit (even with extensive improvements) in accommodating the travel demands in the region. The Preferred Alternative is consistent with the recommendations of the Boston Transportation Planning Review (BTPR) in the early 1970s. Primary access to the CBD is expected to be by transit.

186. The use of effectiveness measures related to cost for comparing the proposed project to various transit improvement alternatives is no longer considered desirable practice in evaluating the cost-effectiveness of transportation projects, because it has many pitfalls, including attaching equal weight to the various "effectiveness" measures (e.g. accident reduction, level of service improvement, noise improvement locations) when in fact their importance varies; attempts to attach numerical values to subjective effectiveness measures (e.g., community disruption); and the natural inclination (or intent) to sum or total these values into a single overall "weighting" factor, since they are all on a common base. It was not considered appropriate to utilize this approach for this project, and was not applied also because its use was not included as part of the federal and state scopes for this project. An extensive analysis of the effectiveness of various transit improvements was performed because of this and similar comments regarding transit as an alternative to the Preferred Alternative. See Appendix 3: TRAFFIC for the documentation of this analysis.

187. This SIS does not cover the operating problems of the Red Line, which are beyond the agreed upon scope of the Central Artery/Third Harbor Tunnel Project Environmental Impact Report. The MBTA is striving to improve service provided on the Red Line, and is expected to receive additional Red Line trains in the near future. Ferries are discussed in Sections 2.3.5 Pre-EIS studies, 3.1.4 Other Transportation Facilities, and 4.2.8 Other Transportation Facilities Impacts of the FEIS/FEIR.

188. The Commonwealth has agreed with EOEa to continue the environmental process for analysis of potential impacts of stage construction and construction methods beyond the FEIS/FEIR phase of this project. Further environmental documentation in this area will occur after FEIS/FEIR publication. (See also response to Comment No. 162).

189. As agreed by EOEa, the ramps closed for more than a weekend are impossible to predict at the EIS/FEIR stage. Therefore, this comment has been modified to address ramps closed for longer than a month. A listing of Central Artery ramps which would be closed for longer than a month is contained in Section 4.2.9 Construction Impacts of the FEIS/FEIR. The listing includes comments on potential alternative routes.

190. Routing of hazardous cargoes along the depressed Central Artery alignment and the seaport access tunnel alignment in South Boston is addressed in Section 4.2.7 Safety of the FEIS/FEIR.

191. The SDEIS/DEIR did contain discussions of the impacts of the proposed project on the Charles River Basin, including project description (2.2); design consequences (2.6.4); construction traffic maintenance (4.1.3); Storror Drive/Leverett Circle traffic impacts (4.2); including construction period impacts (4.2.8); land use impacts (4.4.3); community facilities impacts (4.5.2); construction-period air quality impacts (4.7.6); filling and hydraulic impacts (4.9.3); floodplain impacts (4.11); historic resources impacts (4.14.1); utilities impacts (4.15); aesthetic impacts (4.16.1); joint development (4.16.1); utilities impacts (4.15); aesthetic impacts (4.16.5); and 4(f) impacts (5.1.3, 5.2.1). Expanded discussions of Charles River Basin impacts appear in the comparable FEIS/FEIR sections, plus Section 1.4.2 North Station/Charles River Basin. As noted in the FEIS/FEIR, and in response to Comment No. 162, further analysis and design refinement will be specifically performed to address and resolve issues in the Charles River Basin area.

192. The evaluation of ramp design, and the forecasting of impacts from full ramp designs, may well have led to an underestimation of the implications of these ramps. However, interactive communications were maintained between the consultant team members, EOTC, MDPW, MDC, and the BRA during the course of preparation of the SDEIS/DEIR, including the BRA's and MDC's proposed plans for development along the Charles River. Ongoing communication has been maintained during FEIS/FEIR preparation, and will be continued through the design phase, to attempt to resolve identified issues and areas of controversy concerning the bridges and ramps over the Charles River, including traffic impacts of connections to Storror Drive and Leverett Circle; air quality impacts at Leverett Circle; aesthetic and shadow effects on the Charles River Basin, Dam, and park (Paul Revere Landing) areas; compatibility with MDC river-oak park plans and BRA North Station development plans; fill, floodplain and basin navigation impacts and 4(f) impacts. The FEIS/FEIR addresses all of these areas of impact in the appropriate impact sections, and identifies unresolved issues which will have to be addressed further during design. On-going coordination with the BRA and MDC is especially critical, because of the lack of compatibility between their plans and the uncertainty of the BRA's proposed "island" development.

especially Sections 1.4.2, 2.5.1, 4.4.3, 4.14.2, 4.16.2, 5.1.3, 5.1.4, and 5.2. As indicated in response to Comment No. 162, the FEIR has also identified this issue as an area needing further environmental study during the preliminary design phase of this project.

193. The Central Artery southbound off-ramp (from Interstate Route 93 and Route 1A/Hyatt-Tobin Bridge) diverges from the Artery in a two-lane configuration, tapering to one lane before entering Storror Drive beneath Leverett Circle. The Central Artery northbound off-ramp to Storror Drive also diverges from the Artery in a two-lane configuration, maintaining two lanes before merging with the tapered one-lane Artery southbound connection on Storror Drive beneath Leverett Circle. The Storror Drive junction of these two ramp merges beneath Leverett Circle has been widened from two to three lanes, resulting in three lanes merging into three lanes, rather than four lanes merging to two lanes, as has been suggested (See Figures JB and JC in the FEIS/FEIR). This three-lane Storror Drive cross section is consistent with the three-lane main line weave of Storror Drive immediately downstream, which is outside the project limits.

194. The alignment of the connector ramps in this area has been shifted slightly to reduce the filling required by the project. Filling within the limits of the Charles River is discussed and also described graphically (Figure 67) in Section 4.9.3 of the FEIS/FEIR; see also the Subordinate Engineering Report. Fill impacts on the Charles River will be addressed in more detail during the preliminary design phase, and is one of the items cited by EOEa as requiring further environmental study at that time, in connection with other Charles River Basin impacts.

195. See Section 4.9 Water Resources for a discussion of the potential impacts of the filling which is proposed to occur within the Charles River in conjunction with the proposed project. No significant navigational impacts are anticipated. The project has been discussed with several of the agencies identified by EOEa; further consultation and coordination with these and other regulatory agencies will be required throughout the design phase.

196. EOTC and MDPW are aware of the significance of the impacts on the Charles River Dam. Design modifications to the two bridges could include the use of a cable suspension design to lighten the bridge superstructure, or improvements to the underside of the bridge structure such as sound mufflers and lighting. EOTC and MDPW will continue to work closely with MDC to facilitate land acquisition for the MDC's river edge park. Extensive coordination with the BRA is also necessary in development of a single plan for the area which addresses the preservation of access to recreational values of the Charles River Basin. See Sections 4.4.3 The Preferred Alternative (re land use impacts, North Station Area) and 5.1.4 Paul Revere Landing Park in the Section 4(f) Evaluation.

197. See responses to Comment Nos. 190 through 194 relative to project issues and areas of controversy regarding Leverett Circle, Storror Drive, BRA and MBTA North Station Plans, and MDC park development plans. All of the proposed schemes contained in the SDEIS/DEIR and the Preferred Alternative in this FEIS/FEIR are based on the same guiding principle relative to connections to Leverett Circle and Storror Drive. This guiding principle is that future connections between the Artery and Leverett Circle/Storror Drive will maintain the character of present connections, namely:

- (a) The connection from Storror Drive to the Artery will pass through an at-grade Leverett Circle intersection.

(b) The connection to Storrow Drive from the Artery will connect directly to Storrow Drive via a tunnel connection beneath Leverett Circle.

(c) Storrow Drive itself south of the Leverett Circle area will remain unchanged, and outside the project limits.

This guiding principle has been followed in line with the Commonwealth's desire to not increase the attractiveness of Storrow Drive as a through commuter route for traffic destined from the west of Boston to the downtown and points north and south on the Artery. See also Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE.

Notwithstanding the Commonwealth's position in this regard, the FHWA has identified resolution of North Station/Charles River Basin area conflicts and the Leverett Circle Connector as issues requiring further environmental study during the preliminary design phase of this project (see response to Comment No. 162).

198. Although the amount of dredged and excavated material to be disposed from this project is significant, the quantities are not extraordinary relative to other major public works projects. The MBTA's Orange Line Southwest Corridor Project and Red Line Northwest Extension Project have generated approximately 2.9 million cubic yards of materials for disposal. This is not to say that excavated and dredged materials disposal from the Preferred Alternative is not a problem. Section 4.13 of the FEIS/FEIR discusses the options available for both dredged and excavated materials. As indicated in Section 4.13, a portion of the excavated materials is suitable for reuse as backfill, thus reducing somewhat the disposal requirements. A number of potential landfill sites exist for disposal of the excavated materials, while ocean disposal of the dredged materials is anticipated. In both instances, however, additional chemical and biological testing of the materials is necessary, as well as extensive continuing coordination with the appropriate regulatory agencies. These issues will be resolved during the next phase of the project. As indicated in responses to Comment No. 162, the FHWA has identified this issue as requiring additional environmental study during the design phases of the project.

199. The profile of the depressed Artery results in a "deep" depression because of constraints related to acceptable vertical geometry. See Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE of the FEIS/FEIR (subsection 2.5.2) for further discussion of the vertical constraints which lead to the selection of the preferred profile. See also response to EOE Comment No. 198.

200. Dredge spoil disposal, including upland disposal, is discussed in Section 4.13 of the FEIS/FEIR. See also response to Comment No. 198.



The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
Division of Air Quality Control
One Winter Street, Boston 02108

ATTENTION: Mr. Robert J. McDonagh, P.E.

Mr. Robert J. McDonagh, P.E.
Chief Engineer, Department of Public Works
100 North Street
Boston, Massachusetts 02114

Dear Mr. McDonagh:

The Department of Environmental Quality Engineering, Division of Air Quality Control, has reviewed the report to the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93 dated June, 1983. We offer the following comments for your consideration in preparing the final document.

1) SIP Consistency: In order for the project to be consistent with the 1982 revised Massachusetts State Implementation Plan for Ozone and Carbon Monoxide, the following issues need to be properly documented in the report.

a. Hydrocarbons (HC): At such time as the project moves into the construction phase and is placed on the annual element (AE) of the TIP, additional HC reduction projects must also be placed on the AE in order to offset those increases anticipated from the Third Harbor/Central Artery Project. A commitment to the implementation of these projects in the final document is required. The SIP consistency of the Project/Central Artery must be made in order to show consistency with the SIP.

b. Carbon Monoxide (CO): DEQE questions whether the eight-hour values listed in Table 89 (page 212) are inclusive of all contributions (i.e., toll plaza emissions included, on Table 90, page 214); if they have not been included, they should be. If toll plaza emissions are included, when added in with the eight hour values, could create in some cases, total emissions in excess of the standard. In light of this, it is suggested that in the final report, credit be taken in future years, for the state's newly instituted I/M Program. This will ensure a reasonable margin of safety relative to possible standard violations, due to this project.

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2) Nitrogen Dioxide (NO₂):

a. Annual Average: While an analysis was not performed, a review of current air quality data and a review of the projected increases in NO₂ indicates that there would not be an exceedance of the NO₂ annual standard in this area resulting from this project. We do note, however, that the NO₂ levels are increasing at a steady rate within this area due to past and proposed projects. It appears that given the several additional projects proposed for this area, there is the potential to create an NO₂ annual standard violation in the area. In order to avoid this, the project should be required to generate increased NO₂ in this area, will be required to analyze both the annual and short-term periods.

b. Short-Term Policy: The project will exceed those levels established in the Department's short-term NO₂ policy. Therefore, the project proponents must identify, evaluate and commit to mitigation measures during design phase. The project proponents should conduct a detailed analysis of the project, the adequacy of the analysis and commitments in order to meet established policy levels. Section 3-5: Existing Air Quality (page 75) should include information on DEQE's short-term NO₂ policy.

3) Total Suspended Particulates (TSP)

As mentioned in the EIR, this project will have considerable problems with fugitive emissions (construction, dust and diesel emissions). The area in which construction will occur contains many sensitive receptors. Currently, Boston is re-classified for particulate emissions attainment and will be re-classified, shortly, to non-attainment due to violations of the standard occurring last year and this year. In light of these problems, it is necessary to further address mitigation measures to control fugitive and diesel emissions in the final report.

a) Miscellaneous Comments:

a. Alternative 5A modified, needs to be further analyzed for air quality impacts in the final EIS.

b. Air quality impacts should be included in the Summary on pages VIII - XIV.

c. It should be noted, that violations of the one-hour carbon monoxide standard were recorded at the state's Essex Street, Boston monitor in 1982.

d. Effects of the toll plazas on South Boston's air quality, should be evaluated if this becomes an option.

e. Section 4.7.6 Tunnel Ventilation (page 215) states that the design phase, as analyzed in the report assumed no tie-ups; is this a realistic assumption?

Should you have questions relative to these comments, please contact Ms. Heidi O'Brien (292-5623).

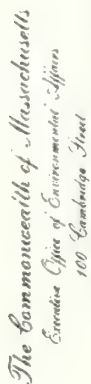
Very truly yours

Bruci K. Mallett for
Kenneth A. Hagg, Director
Division of Air Quality
Control

cc: James A. Walsh, PEWA, Division
Administrator
Judy Adams, MCE
Michael Waber, Met. Boston AFCD
Donald Cooke, EPA

RESPONSE TO COMMENTS BY THE MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL QUALITY
ENGINEERING (No Date)

201. As discussed in Section 4.7 AIR QUALITY, the Preferred Alternative does not increase NHSC; offsetting measures are therefore not necessary.
202. Based on further consultation with DEQ and EPA, the air quality analysis of the Preferred Alternative includes CO emissions from all sources, including toll plazas and vent buildings.
203. The air quality analysis identifies locations where violations of the DEQ short-term policy on NO₂ will be violated, without mitigating measures. As discussed in Section 4.7 AIR QUALITY, revisions to the ventilation building and system design will be necessary and will occur during the design phase to assure project compliance with this policy.
204. Measures to mitigate fugitive dust during construction are addressed in Section 4.7 Air Quality.
205. A detailed air quality analysis of Alternative 5A Modified (the Preferred Alternative) has been performed and the results are included in Section 4.7.
206. This error of omission has been corrected in the FES/PEIR SUMMARY.
207. The affected environment section of the FES/PEIR has not been updated to include the very latest air quality monitoring results of DEQ. However, the Preferred Alternative improves CO levels in the East Boston area.
208. These impacts are evaluated and presented in Section 4.7.
209. The wording has been corrected in the FES for this discussion. The analysis was based on traffic volumes from Section 4.2 TRANSPORTATION of the FES; "design conditions" were not intended to refer to traffic level of service C, but actually referred to the expected operating conditions on the tunnel segments during peak hours.



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Lead Use

The SDRS raises potentially significant issues as they relate to the use of new land that will be created in the Fort Point Channel area. The RIS must address the following issues, related to the creation of new land in the Commonwealth tidelands.

1. since the fill in the Fort Point Channel will be placed on islands owned by the Commonwealth, how much of the new space created will be accessible to pedestrian traffic? What stipulations will there be for pedestrian and passive recreational use? What stipulations will there be for the use of the islands for other purposes? Will this new space be used in the form of a public market? Will the islands be used for other purposes? Will the islands thereby provide "visual access to the water's edge"?
2. The SDEIS states that there will be a "joint development parcel of access" that is described as follows: "What type of activities will take place on this parcel? Will it be used for other purposes? Will it be placed on the edge of the adjacent water?"

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Sue Weller, Director, WEPB Unit
August 22, 1983
Page 2

g. The FEIS must identify how the proposed alternative relates to existing use plans for that area, all the joint development proposals for the Fort Belknap Area - Peace Construction to either visual or physical access to the waterfront. What plans will be made to provide public access across the roadway? Will it contain open space usage that is compatible with existing development projects and proposals?

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The FPLS must address the issue of noise pollution. How will the impacts of increased noise be mitigated? Based on the SPLIS, noise levels will cause disruption of activities related to water dependent and recreational uses. According to the SPLIS, noise levels within the coastal zone area under all alternatives exceed the FPLM's noise criteria for activity category B (playgrounds, recreation areas, parks, residential, schools, etc.). The FPLIS must discuss the methods that will be used to abate the noise during and after construction, to levels which will permit continued use of the area for all activities identified above.

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CZM Policy #26 requires that CZM evaluate transportation proposals in terms of how they fit into overall regional and area goals and objectives. The FEIS should include an evaluation of this project's impacts on other plans for the project area that have been developed by other state and local agencies including the BSA, MDC, EDIC, Massport and private developers.

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Navigation

The TRIS must address the potential impacts to navigation that will occur during the construction phase of the project. Both recreational and commercial users of the Harbor can be adversely affected by the construction associated with the tunnel. If a Third Harbor Tunnel is the preferred alternative, the project proponent must identify the potential impacts to navigation in the Harbor and the methods for mitigating or eliminating them. The issue of navigational safety as it relates to the proposed 2000 ft. long, 20 ft. deep, 20 ft. wide, 20 ft. high, 20 ft. wide channel traffic and the potential for collision with the tunnel must be identified. The potential disruption to recreational and commercial fishing vessels and other commercial traffic must be identified and evaluated.

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Water Quality

The FEIS should address the potential impacts to water quality in Boston Harbor since the proposed project is likely to impact wastewater discharges to the harbor from the Fort Point Channel, South Bay and General Electric areas. The FEIS should include:

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1. A specific identification of all the combined sewer overflow projects which will be impacted in the Fort Point Channel, South Bay, and along the waterfront.
2. An evaluation of the potential impacts to the infrastructure and the capacity of the NDC sewer system in terms of its ability to handle new sewer discharges that will result from:
 - a. new development on land created as a result of construction in the Fort Point Channel area; and
 - b. new land made available for development by the depression of the central artery.
3. An evaluation of the use of federal highway funds for the construction of the Fort Point Channel area, and the overflows which will be impacted by road and tunnel construction.

Tidelands Filling

The FEIS must evaluate the potential impacts caused by the filling of tidelands as follows:

1. Fort Point Channel: The SDGIS states on page vi that new development parcels will be created at the southern end of Fort Point Channel as the result of the placement of fill material from tunnel construction. The FEIS should:
 - a. clearly identify the geographic area to be filled;
 - b. identify the procedure for filling (i.e. type and source of material to be deposited, and whether or not the material needs to be dewatered);
 - c. assess the impact of filling on the tidal prism and the circulation and flushing capacity; and
 - d. evaluate the filling of the Fort Point Channel area (and at any other tidelands) in terms of its compliance with the public interest requirements of Chapter 31 of the General Laws of the Commonwealth, and the potential for public interest in intertidal lands as well as subtidal lands.

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2. Charles River Basin: The SDGIS states on pages 240 and 241 that construction activity at the Charles River Dam will cause displacement of 53,000 cubic feet of water. The FEIS should:
 - a. clearly identify the geographic area to be affected;
 - b. identify the compensation necessary for the flood storage capacity lost by filling in this area;
 - c. describe the effect the displacement will have on circulation patterns in the section of the Charles River which will be affected by the construction; and
 - d. identify mitigative measures which are necessary to avoid or minimize impacts on anadromous fisheries resources.

Dredging

Some of the sediments which would be dredged are contaminated with relatively high levels of heavy metals and synthetic chemicals. State policy favors in-harbor sites over open ocean sites for disposal of contaminated dredge material, if the leaching of contaminants can be contained by an impermeable bulkhead or filtering system. If, however, all other alternatives, including limiting the extent of dredging, not dredging at all, or on-land and in-harbor disposal are not feasible, the FEIS should discuss the feasibility of on-land or in-harbor disposal sites as well as the extent of necessary dredging for each of the proposed alternatives.

The FEIS should also:

1. Describe the methods used to dewater dredge materials that would be disposed of at an on-land or in-harbor disposal site.
2. Substantiate any determination of insignificance of wetland or shellfish resources such as the insignificance of the shellfish bed in Jeffrey Cove.
3. Clarify the circumstances under which a mixture of lime/water will be used to control odor as it relates to dredge material handling or storage.
4. Discuss the effectiveness of using silt curtains to reduce turbidity during dredging in areas of significant tidal or current activity. The FEIS should discuss the feasibility of minimizing turbidity by other means such as scheduling of construction activities.

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5. Address the problems associated with the disturbance and release of contaminants in Boston Harbor sediments during: a) dredging, b) excavation and disposal of materials, c) backfilling and ocean disposal of the materials.

6. Dredging associated with the Lynn site for tunnel fabrication will cause significant disruption of coastal resources including wetlands, shellfish flats, and finfish populations. Appropriate mitigation measures must be taken at the Lynn site. The NEPA must sufficiently detail in the FEIS, the mitigation measures that will be taken to minimize the impacts of the project. The FEIS must include specific methods for minimizing turbidity, restoring shellfish resources, and re-establishing wetlands as required under the coastal wetland regulations for the Wetlands Protection Act.

Excavated Sediments

Since the Corps/OPA does not presently allow the disposal of excavated material in the ocean at the Foul Area, the FEIS must:

- describe in more detail its plan for the alternate disposal of the materials;
- identify not only the route to be taken from the immediate excavation site but the final destination of the trucked materials;
- describe alternate sites that might be used, other than landfill;
- provide plans for dewatering the material (if that proves necessary); and
- discuss plans for the filtration of slurries from the material, if necessary.

Federal Consistency Review

It should be noted that the Massachusetts Coastal Zone Management (NCZM) Program will exercise its federal consistency review authority over the proposed project and before any federal licenses or permits are awarded to the state.

The NCZM Program, pursuant to 15 CFR 930.90 - .100, must review and approve all state and local government activities affecting the coastal zone that are supported by federal financial assistance for consistency with the NCZM Program policies. Notification of such funding activities is given to the NCZM Program through the A-95 review process.

In addition, when federal licenses and/or permits are sought, the NCZM Program, pursuant to 15 CFR 930.37, requires that a federal consistency certification be obtained from the NCZM Program. The NCZM Program will certify but also to the NCZM Program stating that the proposed actions comply with the policies of the Massachusetts approved coastal management program and will be conducted in a manner consistent with such policies. The Project Review Coordinator in the NCZM Office should be contacted at 727-9550 for further information regarding the review.

APD:LN:CC:bam

RESPONSE TO COMMENTS BY THE COASTAL ZONE MANAGEMENT OFFICE (August 22, 1983)

210. At the southern boundary of Port Point Channel, the Preferred Alternative provides for a one acre parcel which will be available for possible boat landing purposes. This parcel will have access to the pedestrian walkway to be built on the western edge of the Channel, an amenity which provides for passive enjoyment of the Channel with the potential for more active marina uses. These pedestrian uses do not presently exist on this side of the Channel. See Section 4.16 AESTHETIC IMPACTS for a complete description of impacts in this area.

211. Design modification of the Preferred Alternative provide for a tunnel box deep enough to remain underwater, eliminating the need to create this parcel.

212. Section 4.4 LAND USE and Section 4.16 AESTHETIC IMPACTS describe how the Preferred Alternative will affect Port Point Channel and relate to existing plans. Pedestrian access to the water's edge will be provided from the southern end of the Channel to the area north of Congress St.

213. Comparison of the Preferred Alternative and the No-build shows that the Preferred Alternative will not be perceptibly louder at any of the sites. The Preferred Alternative will be perceptibly quieter than the No-build at six sites by as much as 11 decibels. Predicted total noise levels do however exceed the FHWA Noise Abatement Criterion in several areas. Potential noise abatement measures include traffic management, acquisition of buffer zones, noise insulation of public-use or non-profit institutional structures and noise barriers, all of which are evaluated in Section 4.8 of the FEIS.

214. Throughout the EIS/FEIR process, information and comments have been solicited from agencies, private developers, business interests and the community regarding the alignments. This exchange of information has occurred in the formal setting of the Intersagency and Working Committee meetings and in less formal individual meetings. The plans of the agencies named in the CZM letter have received particular attention as have the plans of private developers and business interests. Traffic forecasts and analysis, for example, contain estimates of proposed developments. To the greatest degree possible, conflicts between these proposals and the project have been resolved in the Preferred Alternative. Some areas of conflict such as the BRA's phase II plans for North Station still remain and continued attention will be given to them during the design phase of the project. It should be noted that in some instances proposals by agencies themselves conflicted, and these situations were also considered.

215. After construction there will be no impact to navigation in either the Charles River, Boston Harbor, or the Port Point Channel. Construction will cause some inconvenience to navigation but only for one day at a time, approximately 10 times, will large ship navigation be restricted. Additional information on impacts to navigation during construction are found in Section 4.4.3 LAND USE.

216. Construction of the East Boston CSO project on Bird Island will not affect Port Point Channel CSO facility will not be precluded by any aspect of the Third Harbor Tunnel and Central Artery project. Likewise, there will be no impact on programmed improvements to sewer systems.

217. These potential impacts are beyond the scope of this project. Impacts must be evaluated by the development proponents.

218. The use of Federal Highway Funds for the construction of treatment facilities for combined sewer overflows is highly unlikely. However, the Commonwealth is extremely interested in having this work coordinated with this project and will investigate the possibility of increasing the Combined Sewer Overflow Projects priority for EPA funding.

219. The area of Port Point Channel to be filled extends from West Fourth Street to the existing Dorchester Avenue Bridge. Additional occupation of water area in the Port Point Channel will take place as the tunnel rises above water surface to the south and north of Summer Street.

220. All filling will take place behind sheet steel walls. There will not be any open water filling and the only foreseeable requirement for dewatering will be the dewatering of construction areas once they are enclosed behind steel walls.

221. A detailed analysis of long-term and short-term impacts from filling parts of the Port Point Channel has been conducted and is contained in Section 4.9.3 and Section 4.9.4 in WATER RESOURCES.

222. All concerns cited in Chapter 91 have been addressed in detail in Chapter 4.0 of the FEIS/FEIR. Construction of the Third Harbor Tunnel and Central Artery will not contravene the requirements of Chapter 91 and associated regulations.

223. Figure 60 in the FEIS/FEIR shows the specific areas in the Charles River to be constructed upon. Further discussion is found in Section 4.9.3 WATER RESOURCES.

224. Discussions of floodplain impacts are found in Section 4.11.2 FLOOD PLAINS. In summary, there will be no impacts to the flood storage in the Charles River because of the close proximity of the construction site to the regulating dam. Therefore no compensation is considered necessary.

225. Because of the proximity of the construction to the new Charles River dam there will be no impact on circulation and flushing in the Charles River. Additional discussion of impacts to the Charles River are found in Sections 4.9.3 and 4.9.4 WATER RESOURCES.

226. Because construction in the Charles River will take place behind sheet steel walls, no mitigation of impacts to anadromous fish is considered necessary regardless of construction phasing.

227. A detailed analysis of dredging, excavation, and disposal alternatives to include land and sea areas is found in Section 4.13 DREDGED AND EXCAVATED MATERIAL DISPOSAL.

228. The only dewatering requirement is for construction sites after they have been contained behind sheet steel walls. No dewatering of dredged or excavated materials is foreseen at this time.

229. There will be no impacts from the Preferred Alternative on the soft shell clam bed in Jeffries Cove which is approximately 100 square feet in area; the alignment of the Preferred Alternative avoids Jeffries Cove.

230. A discussion of impacts resulting from odors during excavation and dredging, and appropriate mitigation measures is found in Section 4.9.4 WATER RESOURCES.

231. There will be no open water dredging in the Port Point Channel or the Charles River. However, in order to limit the introduction of turbidity as dredged material is being loaded, silt screens will be deployed around the pumps dewatering construction sites. Alterations in scheduling construction to mitigate turbidity is not feasible since the problem will occur whenever construction takes place.

232. A detailed analysis of impacts to water quality associated with dredging, tunnel placement, and backfilling is contained in Section 4.9.4 WATER RESOURCES.

233. A decision to utilize the Lynn site cannot be made at this time. Later analyses will determine the type of material for tunnel construction and at that time fabrication sites will be determined based on the type of material. Should Lynn still be considered suitable, additional ecological analyses will be conducted as required by the Corps of Engineers.

234. A detailed analysis of dredged and excavated material disposal requirements and sites is contained in Section 4.13. In as much as a specific identification of potential sites is not possible at this time, transportation routes and methods cannot be addressed. Dewatering of excavated materials is not considered necessary at this time.

235. A statement of consistency is included in COMMENTS AND COORDINATION.



The Commonwealth of Massachusetts
Metropolitan District Commission
50 Somerset Street, Boston 2008

WILLIAM J. SEARY
Commissioner

August 15, 1983

Mr. James A. Walsh
Division Administrator
Federal Highway Administration
55 Broadway
Cambridge, Massachusetts 02142

Dear Mr. Walsh:

The Metropolitan District Commission is the agency with the primary responsibility for the police and emergency services on the Central Artery; the management of traffic on nearby parkways; the preservation and enhancement of the parklands Charles River Basin Historic District; and the water quality, recreational and navigational use and flood management of the Charles River. With these responsibilities the agency is directly impacted by the proposed projects.

It is the Metropolitan District Commission's opinion that a depressed and widened Central Artery and new tunnel will provide the citizens of this city and this region with a safer and more efficient highway system. The Central Artery now experiences 3 1/2 times the national accident rate for urban highways. In 1981 Metropolitan District Commission Statistics indicated a total of 82 accidents in the area from the City Square on-ramp through the South End to the South End off-ramp. Ninety percent of these accidents involved personal injury.

The congestion and outdated design of this short stretch of road are the reasons for the alarming number of accidents. The many access ramps merge on to a highway that has inadequate deceleration and acceleration lanes and no breakdown lanes. It is our judgement that mere reconstruction of the artery will not remove the causes of the many accidents.

Construction of the tunnel and depression of the artery create a once-in-a-generation opportunity to significantly improve the quality of life for metropolitan Boston residents. Our challenge is to maximize that opportunity. The following comments are directed to that end.

I. WATER QUALITY

Section 4-5 raises some serious questions concerning drainage, M.D.C. rules and regulations prohibit storm drain connections into sanitary sewers. A connection to an existing combined sewer is allowed, but is subject to pretreatment requirements. The removal of heavy metals and sediments in Table 37 appear low. Further discussion

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of pretreatment approaches should be presented.

Apparently construction in the Charles River will be behind sheet steel retaining walls. The effect of this approach on the Dam, locks and basin water quality should be more fully discussed as it relates to the construction of the two new bridges as well as for the construction of the Central Artery to Storrow Drive connection.

II. CONSTRUCTION PHASING

It is difficult to clearly understand construction phasing and deviation for specific segments of the project. Clarification of timing is needed for the construction of the Central Artery to Storrow Drive connection, and the two new bridges.

III. TRAFFIC

It is stated (p. 170) that ramp connections between I-93 and Laverett Circle will be unavailable for one year. A brief description of detour routes for this extremely heavy traffic movement should be presented.

New rerouting of Charles Street traffic has changed volumes and construction of Storrow Drive between Arlington Street and Laverett Circle. Was this included in the traffic assignment network and does it affect the Storrow Drive on-ramp volumes (p. 133) and queuing (pp. 187-189)?

The Storrow Drive-Laverett Circle connecting ramp construction is stated to have major impacts for a two year period (p. 164) mitigating measures and full description of alternative routes and impacts should be presented. The impact on the Craigie Bridge (Charles River Dam) is of particular concern.

IV. NOISE (LONG TERM EFFECTS)

No noise abatement proposals are made for the Charles River Dam Park. It is unclear from the text if any are proposed. If proposals exist they should be described; if not the impacts should be more fully described.

The effects of pile driving for new bridge piers (both noise and vibration) on the Charles River Dam and Park should be presented (pp. 134-137).

V. FLOODPLAIN

Apparently the Charles River will be filled in by .7 acre. This fill, its location, effect on construction techniques, finished embankment descriptions etc. should be clearly indicated. Final elevations and river-bank configuration are particularly important.

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VI. PEDESTRIAN CIRCULATION

Pedestrian access to Charles River Dam was a major design objective in its construction. Mitigating measures (p. 194) do not address the need to preserve this pedestrian connection to the Dam. Police vehicles must also have constant access as the Dam is the station for the NDC Police Harbor Patrol.

Pedestrians must also have constant access to Science Park Station. In the absence of the pedestrian bridge at Leverett Circle, how will this station function for Museum of Science, Hospitals etc?

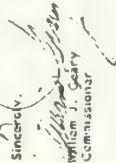
VII. CHARLES RIVER DAM

The impacts on the Charles River Dam are significant. The Commission recognizes the challenge of the design problem and acknowledges that some impact is inevitable. However 15' or less of clearance under twelve lanes of high volume traffic, in addition to the 40,000 square feet of land with less than 8' of clearance requires extensive, detailed, and innovative design measures to mitigate the current proposal. Such measures should be possible to develop. In the design phase of the project the Commission has a major park improvement plan for the Basin extension and the thoughtful incorporation of this plan into the construction is imperative. The thoughtful incorporation of this plan into the construction to the spacing of the two bridge structures should be fully explored. The view from the Dam for the operators, police and recreational users must be considered. The Commission is anxious to work closely with the Department to develop a comprehensive program for impact mitigation in this area.

VIII. FACTUAL ERROR

The boundary of the National Register District does include Storrow Drive and Leverett Circle (p. 231). The review process for National Register properties should be described.

The Commission appreciates the opportunity to comment on this EIS/EIR. And is confident that it can work closely with the Department of Public Works and EOTC on the aforementioned issues. The proposal project is vital and we believe can be designed to be a lasting benefit to the use and enjoyment of the area to be impacted by its construction.

Sincerely,

 William J. Geary
 Commissioner

WJC:cso

RESPONSE TO COMMENTS BY THE METROPOLITAN DISTRICT COMMISSION (August 15, 1983)

236. The statement in Section 4.9 WATER RESOURCES referred to discharge of wastewater, not stormwater, to the sanitary sewerage system. Based on further discussions with the MDC, the EIS text includes a description of oil/water separation facilities which will also be included in the project.

The source for removal rates of primary sedimentation is the U.S. Environmental Protection Agency. Further discussion of pre-treatment is now included in the EIS; these measures will be fully coordinated during the design phase with the MDC.

237. Water quality impacts of construction in the Charles River have been further discussed in Section 4.9.3 of the EIS. Because construction will occur behind steel sheet piling, and because of the continued flushing of freshwater to Boston Harbor through the new dam, there will be no long-term impact to water quality. Specific measures to control turbidity during construction include use of silt curtains, and will be specified in contract documents.

238. The tentative construction schedule for the total project is described in the Supportive Engineering Report. Because of the conceptual planning of the project, however, details of the ultimate construction and effects of the Central Artery, Storrow Drive, and new bridge construction will not be known until the design phase of the project. At that time, the MDPW will coordinate the proposed construction activities with the MDC and other interested and affected parties in the area to minimize to the extent possible all construction related impacts.

239. The details of the actual detour routes have not been developed to date, although based on the present level of analysis, a brief description of the possible detour route in this area is presented in Section 4.2. At this time, it appears that new ramps will be constructed prior to removal of the existing Central Artery/Storrow Drive connections.

240. Unfortunately, this recent directionality change was still experimental at the time of the creation of the traffic assignments. The changed directionality may result in somewhat higher traffic volumes northbound on Storrow Drive from Arlington Street to Leverett Circle.

241. See response to comment number 239. The Commonwealth is committed to preparation of further environmental documentation on construction period impacts subsequent to this EIS/EIR. MDC concerns on construction impacts will be addressed at that time.

242. The potential noise impacts at the Charles River Dam park are described in Section 4.8.1 NOISE AND VIBRATION. As discussed in that section, a noise barrier is proposed to be constructed along the edge of the Gateway Station Central Artery northbound ramp.

243. Noise and vibration impacts of the proposed construction in the Charles River Dam area are discussed in Section 4.8. Impacts on the Charles River from pile driving are not expected to be serious, although during the construction phase use of low-displacement piles and other measures will be considered to assure these impacts are insignificant.

244. The location of the proposed fill in the Charles River is clearly described and presented graphically in Figure 61 in Section 4.9.3. Preliminary elevations are shown in the cross-sections of this area depicted in their Supportive Engineering Report to the FEIS.

245. With the Preferred Alternative, pedestrian access and MDC Police Harbor Patrol vehicular access will be maintained at all times, during and after construction. As part of the project, replacement of the MDC access road connecting Causeway Street to the new Charles River Dam will be designed as an attractive landscaped pedestrian way connecting the North Station area and downtown to Charlestown via the dam; see Section 5.1.4 Paul Revere Landing Park. The construction easement has been realigned so that the pedestrian bridge will be braced during construction, rather than relocated; the bridge will be serviceable in its present location at all times. Access to Science Park Station will be maintained at all times, as will the pedestrian overpass at Leverett Circle.

246. The Commonwealth is aware of the significance of the impacts on the Charles River Dam. The MDPW is committed to developing a design which will to the extent feasible support the MDC's park improvement plan for the Basin extension. Design modifications to the two bridges could include the use of a cable suspension design to lighten the bridge super structure or improvements to the underside of the bridge structure such as lighting. Work on the final design will involve consultation between the MDPW, MDC, FHWA, and other Federal agencies with jurisdiction over waterways. See Sections 4.4 LAND USE (North Station Area) and 5.1.3 Paul Revere Landing Park.

247. The description of the boundary of the Charles River Basin National Register Historic District has been corrected to reflect this information; see Section 3.11.1 Historic Resources. The review process for National Register properties is described in Section 4.14.2 Impacts on Historic Properties.



Commonwealth of Massachusetts
HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON

MOORE F. FLAHERTY
CLERK

August 9, 1983

Secretary James S. Hoyte
Executive Office of Environmental Affairs
130 Cambridge Street
Boston, MA 02202

Dear Mr. Secretary:

Thank you for this opportunity to comment on the latest supplement to the Draft Environmental Impact Report on the Harbor Tunnel, Seaport Access Road Alignment.

At this point in time, I do not feel that one can make a responsible decision for, or against, the various proposals, as many issues of community concern have not adequately been addressed.

Specific matters of concern have been raised at numerous meetings, both public and private, which to date have not received a definite answer.

For example, alternative 5A modified was originally designed to alleviate such of the truck traffic which now overflows into the neighborhood streets of South Boston. Yet, it is not known whether this alignment would be able to handle the increased petroleum container trucks now based in this portion of South Boston.

Given the present status of the proposal, I would venture to say that the situation regarding hazardous cargo does not look promising. If an undertaking of this magnitude will not resolve the problem, can we ever expect to remove these heavy trucks from our crowded side streets? The latest alignment of 5A also raises the question of whether the alignment would be able to handle the front section of South Boston, although it is stated in the report that traffic queues in the area will have no effect on air quality. It is my contention that the over-all impact of traffic congestion at the tolls would be significant.

In addition, no definite decision has been reached to my knowledge, as to the exact placement of ventilation stacks in South Boston, and the structures immediately create adverse impact on air quality and land use in surrounding areas.

In fairness to the communities which will be severely affected by the lengthy construction phase of any alternative, I feel that a

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Secretary James S. Hoyte
Executive Office of Environmental Affairs
August 9, 1983

strong commitment to provide jobs for residents first should be forthcoming. Yet, the need for jobs is not limited to my ultimate acceptance of a seaport access alignment.

In closing, Mr. Secretary, I would emphasize that I will reserve my judgment on any proposal until firm commitments can be reached in regard to container truck traffic, tolling, air quality and land use impacts, and resident quality of construction job hiring.

Again, thank you for this opportunity to express my views on this important issue.

With kind regards, I am

Sincerely,

Michael F. Flaherty
MICHAEL F. FLAHERTY
CHAIRMAN
COMMITTEE ON THE JUDICIARY

MEF:rh

cc: Frederick Salvucci, Secretary of Transportation
Robert T. Tierney, Commissioner, DPM

RESPONSE TO COMMENTS BY REPRESENTATIVE MICHAEL F. FLAHERTY (August 9, 1983)

248. The Seaport Alignment feature of the Preferred Alternative has been designed with the intention of diverting truck traffic of all categories off of South Boston streets and onto appropriately designed regional highways. It is the policy intention of the Commonwealth that the segment of roadway from the Southeast Expressway to the off ramps at Summer Street, South Boston, accommodate hazardous cargo vehicles. Extraordinary design details may be necessary in the tunnel segments in order to bring about this goal. Concerns of hazardous cargo vehicle use of the Seaport Access Tunnel are discussed in Sections 2.5 DESIGN CONSIDERATIONS and 4.2 TRANSPORTATION of the FEIS. Also discussed in Section 3.5 are specific safety features to be included in the design of the Preferred Alternative for emergency situations.

249. The location and impacts of ventilation buildings are addressed in Section 4.4 LAND USE and Section 4.7 AIR QUALITY. Final locations will be determined after appropriate public input and additional air quality analysis.

250. Specific commitments to employing South Boston residents on the project are beyond the scope of the environmental process. The Commonwealth will investigate job preference programs for local residents.



The Commonwealth of Massachusetts
Department of the State Auditor
One Ashburton Place, Room 1813
Boston, Massachusetts 02108

John J. Donaghy
Auditor of the Commonwealth

August 22, 1983

Mr. Robert J. McDonagh, P.E.
Chief Engineer
Massachusetts Department of Public Works
Boston, Massachusetts

Dear Mr. McDonagh:

The following is a summary of my remarks on August 9 at the Public Hearing regarding the Third Harbor Tunnel, 1/90 and Central Artery, 1-93.

I address my comments particularly to the Depression of the Central Artery. I wish to applaud the plans for the Central Artery brought forward by the leadership and genius of the Executive Office of Transportation and Construction.

This progressive planning will not only prevent the present and future traffic congestion on 1-93 but it will also make possible the return of Boston's historic link to the sea. This is particularly important in the Long Wharf area where the Fenwick Market Historic District and the Custom House Historic District form spaces found in few, if any, cities across the country. The restoration of this area, of District 10, by the National Advisory Council on Historic Preservation as catalyst, has given Boston and the entire country a jewel. This is aside from the tremendous economic advantage it yields in terms of tourism.

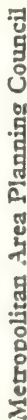
I respectfully urge that the presence of the Historic Districts be used as a planning tool in the consideration of the Depression of the Central Artery and that plans of the Boston Redevelopment Authority or the Board of Public Works, including the Historic Districts, be recommended. This would be a wise use of all the Commonwealth's resources, rather than a piecemeal approach to them.

Sincerely yours,
John J. Donaghy
Management Auditor

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RESPONSE TO COMMENTS BY THE COMMONWEALTH OF MASSACHUSETTS, DEPARTMENT OF THE STATE AUDITOR (August 22, 1983)

251. Historic districts and impacts of this project on those districts have been evaluated as required by the National Historic Preservation Act of 1966. Extensive coordination on historic impacts occurred with the Massachusetts Historical Commission and the Boston Landmarks Commission. See COMMENTS AND COORDINATION for the Section 106 documentation. Concerns of Parcel D-10 should be addressed to the Boston Redevelopment Authority, as its disposition and development is not part of this project.



110 Tremont Street Boston, Massachusetts 02108 (617) 451-2770

Serving 101 Cities & Towns in Metropolitan Boston

August 18, 1983

The Honorable James S. Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

Accepted: 1994

RE: Third Harbor Tunnel, Interstate 90/Central Expressway,
Interstate 93, Supplement to Draft Environmental Impact
Statement/Report (HAPC #IR-83-28, Received 7/1/83) BOSTON 123

Dear Secretary Hoyte:

In accordance with the provisions of Chapter 30, Section 12 of the Massachusetts General Laws, the Metropolitan Area Planning Council has reviewed the Supplement to the District Environmental Impact Statement for the Third Harbor Tunnel and Central Artery and has prepared the following comments as a result of staff review and the extensive involvement of MAPC representatives and advisory committees.

in the previous days, the proposed action will extend to the Massachusetts Turnpike from its present terminus at the Central Expressway in South Boston north to a new interchange in the area of Logan Airport. In addition, the supplement to the Massachusetts Turnpike will involve the depressed and elevated portions of the Central Expressway from the Massachusetts Turnpike interchange northward across the Charles River to an interchange with Interstate 93 and Route 1A.

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- The first of these is the fact that the majority of the population is still living in poverty. The second is the fact that the majority of the population is still living in poverty. The third is the fact that the majority of the population is still living in poverty.

- Given the value of the Port Point Channel as a resource (not fully utilized now) for economic development, aesthetics, recreation, and other water-related uses, as well as its historical significance, measures to alleviate the potential adverse impacts of the tunnel, need to be considered in a greater detail. While Alternative A Modified will impact on the Channel less than Alternative B Modified, the latter will have a more significant adverse impact on the Channel. The proposed tunnel is to be relocated north of the Channel, thereby reducing its length, and will require the northbound artery tunnel box to be viable and project approximately 119 feet from the existing bulkhead along Dorchester Avenue. According to the Supplemental DES, Alternative A alignments that might avoid these impacts to the Channel were considered and rejected. In that the previous engineering and design work appears that slight realignment of the Harbor Tunnel and the northbound Central Artery Tunnel box could reduce or eliminate these impacts to the Channel. We understand that realignments of this nature are presently being examined. We feel further consideration should be given to these modifications. Alternative SA Modified includes an extension and relocation of Dorchester Avenue past Port Point Channel. We recommend that consideration be given to delaying the construction of Dorchester Avenue along the Channel until after other improvements are in place and the necessity of Dorchester Avenue improvements on the Channel to accommodate local traffic demands can be verified. It is our understanding that the plans have been modified to deal with concrete options and that the Company is presently studying the impacts of these modifications. These modifications need to be discussed in the Supplemental DES.

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- (1) General Comments

An extensive and informative traffic analysis has been presented for each of the additional alternatives, including estimated changes in travel speeds, link and intersection levels of service, travel times, and vehicle hours of travel based on forecasts associated with each of the alternatives. The analysis is helpful in that it indicates costs of new traffic in the network, and these costs can be used in conjunction with the benefits and disbenefits to estimate the net benefits of each alternative. This is extremely useful in the analysis.

2) East Boston

The analysis of all alternatives shows large increases in traffic in East Boston, especially Logan Airport and on Route 1A. The document points out that the traffic may increase by 40 to 50 percent by the year 2018, making it one of the highest traffic growth generators in the area. The document also states that traffic will continue to grow on the East Boston streets. If a MTR is not built, the spill-over from the expressways to the local facilities will increase.

The RIS addressed the potential reduction in traffic on local facilities with a new MTR, however, recognizing the traffic problems that presently exist at Central Square, Porter Street and other facilities, it recommended that further analysis be conducted to recommend actions that would improve the local type facilities. Several highway alternatives were considered, and the recommendations and mitigating measures and amenities would be appropriate for this area.

3) Bell Circle - Revere

Related to the increased traffic to the airport is the additional increase in traffic on Route 1A to Bell Circle, adding traffic to a facility that is already level of service F. It is recommended that further analysis be conducted and recommendations be made. Addressing this situation in the peak hour (Table 49) is too low and should be reviewed (for 1998 the V/C ratio is 1.40 for the same a.m. period).

4) Cambridge/Somerville Truck Traffic

MAPC representatives have expressed an interest in extending the prohibition of truck traffic through Cambridge and Somerville in the River Street/Western Avenue/Prospect Street Corridor from the existing nighttime ban to full 24-hour ban. Some of the trip generating activity may be truck traffic. Some of the trip generating activity may be truck traffic. Some of the trip generating activity may be truck traffic. The final RIS should address this concern.

5) North Station/South Station Transit Connection

The Corridor Planning Study conducted prior to the Draft RIS investigated a transit connection alternative between North and South Stations. Alternative 3A, 3B, and 3C which include the depression of the Central Artery again provide the feasibility to include a transit connection. The RIS should recommend additional analysis of final RIS should, at a minimum, recommend additional analysis of bus service on the surface streets and the design of the surface streets should take into consideration the existence of future service including bus turn-outs and a signal preemption system.

Economic Development Impacts

1) An adequate inventory of employment activity by zip code in major portions of the project area is given in the Supplemental Land Use, Community Facilities and Economic Activity Report. The Supplemental Land Use, Community Facilities and Economic Activity Report provides an adequate description of relocation requirements under each of the supplemental alternatives. However, no discussion is included of the possible negative impacts on development in nearby areas such as East Cambridge, Back Bay, and Alewife, for example. Moreover, there is no economic analysis or discussion of MTA's development impacts in some outlying areas such as Lynn, Salem, and Boston. Clearly, the impact of the various build alternatives is regional, and can be expected to be largely beneficial overall.

Our comment #4 in our March 16, 1983 letter of review of the DEIS/DEIR, addressed to Secretary Hoyte, also applies to the supplemental document with respect to regional impact analysis. This comment follows:

"As the regional planning agency for the Boston metropolitan area, MAPC is being asked to provide information about regional impacts of the MTR. Although the DEIS provides extensive information concerning the localized impacts of the build alternatives, no attention is given to the potential impacts of the project to the wider metropolitan area. A project of this magnitude could conceivably affect future regional development patterns, particularly related to residential housing and commercial/office development. Further information should be provided."

Although such an analysis may be beyond the scope of the DEIS, MAPC suggests that the regional issues raised by the project should be the subject of further analysis and public discussion as the project proceeds in the future.

2) The Supplemental DEIS identifies (on page 203-section 4.5.4) major benefits to the region in the full build development of the air rights over the underground central artery. Later in the document this benefit is explored in section 4.5.8, Joint Development on pages 273-284). The full economic benefits of the project on the region cannot be realized without such arrangements as necessary because of the prior structural requirements for the moderate size and large scale buildings. Under current funding, with all parcels slated for "option 1" levels of amenity, this level of development could not take place; any site preparation for development falls under "option 2". MAPC strongly supports efforts to obtain the necessary funding to pursue "option 2" amenities.

Air Quality

1) The air quality analysis provided for the Supplemental DEIS appears thorough; MACC refers to DQ2 for specific review of methodology used in the analysis. The major concern is that reading through all the information about the various pollutants and alternatives is cumbersome and it is difficult for the reader to obtain a clear understanding of the interrelationships between the various alternatives. The only summary table provided for air quality, Table 37, is the only summary table provided; it would be useful for this table to be organized to show more clearly the comparative impacts of each alternative. In addition, it would be helpful to have in the text a clearer explanation of how the various measures at different receptor sites fit together to provide the data presented in Table 37.

It would be useful to have a summary of the analysis stating clearly which alternative(s) provide the least damage or greatest benefit to air quality and how those results relate to existing federal standards.

2) The Supplemental DEIS points out that there will be substantial air quality impacts resulting from heavy truck traffic during the construction period. Much of this truck traffic will be related to removal of materials excavated during tunnel construction. In the final EIS, mitigating measures, such as possible use of the Blue Line for material removal, should be examined in order to reduce truck traffic and resulting exhaust emissions.

Noise and Vibration Impacts

1) This section of the Supplemental DEIS appears to address those impacts likely to result from the alternatives. However, as in the previous DEIS, the analysis of mitigating measures does not clearly indicate the impact of potential noise barriers. Reference to barriers ranging from 18-28 feet tall and 100-150 feet long without illustrative diagrams or renderings is inadequate. Of particular concern are potential barriers at the Mt. and Deer Island plants, the Central Artery and Quincy Market, all of which would severely affect the current character and use of the sites. In general we question the need for such noise barriers after construction has been completed.

2) Construction impacts of noise and vibration are addressed for all alternatives. Clarification of the proposed work schedule is necessary, especially as it relates to mitigating measures. References are made to a system of two, 12 hour shifts per day, of night work, but no mitigating measures are indicated. Reduction of night construction activities, reduction in the length of construction, time of activities and total length of noise and vibration impact should be provided.

Land Use Impacts

The impact of creating approximately 28 acres of developable land through depression of the Central Artery is addressed. However, the proposed benefits are dependent upon the adoption of development guidelines for reuse of this land area. In fact, the presence of proposals for street layout, building types, and building heights should be developed in conjunction with the Central Artery tunnel design. The DEIS fails to address the need for a carefully designed plan for the use of this area rather than simple development guidelines. While such a plan cannot be developed at this stage, we strongly agree that such a plan be prepared, in conjunction with the Boston Redevelopment Authority and the City of Boston, as early as feasible, in the event any of the Central Artery depression alternatives are chosen.

Water Resources

1) Section 4.9.2 of the Supplemental DEIS states that the proposed project could result in reduction of pollutants in the harbor because both the tunnel and depressed Central Artery would concentrate and collect pollutants and discharge them into the harbor through the stormwater drainage system. The document presents estimates of the percent removal of 14 selected pollutants from the harbor. The document states that the estimated percent removal of these pollutants by the wastewater treatment plant. Since many of the pollutants are heavy metals which are not effectively removed by the primary treatment processes used at the Mt. and Deer Island plants, some of the pollutants discharged from the tunnels may find their way into the harbor substantially unaltered. The description of this impact would be greatly clarified if the estimated percent removal of the pollutants by the wastewater treatment plant were factored in so that the final level of discharge to the harbor could be estimated.

2) The most severe water quality impact is associated with dredging during the construction phase. The Supplemental DEIS estimates that there will be a suspended sediment plume with a maximum concentration of 600 mg/l near the dredge, extending to a length of 1200 meters. During dredging operations, the sediment plume should be monitored through water quality testing, and mitigation measures (such as silt curtains) should be implemented if actual concentrations of suspended solids are high enough to cause phytoplankton mortalities, impacts (mortality, interference with endogenous fish passage, etc.).

3) The Supplemental DEIS mentions a reduction in tidal prism in the harbor and Fort Point Channel and increased flushing time in the channel. However, the resulting impacts of these changes on water quality and marine life are not described.

RESPONSE TO COMMENTS BY THE METROPOLITAN AREA PLANNING COUNCIL
(August 18, 1983)

252. The SDEIS/DEIR presented in equal detail the evaluation of impacts of Alternatives 3a, 5A and 6, in comparison to the alternatives evaluated in the SDEIS/DEIR. The specific, detailed analysis of the Preferred Alternative is presented in the appropriate sections of the FEIS/FEIR.
253. An extensive effort was undertaken in refining the Preferred Alternative to minimize the encroachment into the Fort Point Channel. Changes included lowering the profile of the northbound Central Artery tunnel; realigning the tunnel in the vicinity of Sumner and Congress Streets to the west; and narrowing relocated Dorchester Avenue to two lanes northbound. See Section 2.5 DESIGN CONSIDERATIONS. Relocated Dorchester Avenue is an essential element of the project for access into the CBD; this was added to Alternative 5A in the modification because of the unacceptable traffic conditions which would result without this roadway.
254. See responses to comment numbers 629 through 652 for the Gillette Company.
255. The effect of the Preferred Alternative on these streets is evaluated in Section 4.2 TRANSPORTATION. Appropriate measures to address the traffic concerns on these local roadways can be addressed independently of this project.
256. The information presented in Table 69 in the SDEIS/DEIR was incorrect. The year 2010 AM peak hour v/c ratio should have read 1.45. This ratio is corrected in the Preferred Alternative traffic analysis.
257. Future percentages of trucks in the Central Artery were based on existing conditions. Should a 24-hour ban be implemented on the particular streets referenced in Cambridge and Somerville, and these trucks remained on the Central Artery, highway capacity would be decreased. This would adversely affect operating conditions on the Artery.
258. This rail connection was deleted because of the resulting impacts (displacements) which would occur in this corridor from a widened tunnel structure. The Commonwealth of Massachusetts and the City of Boston are pursuing transit and bus system improvements in the area, independent of this project. The Preferred Alternative includes direct bus ramps to/from the South Station Transportation Center, and southward to the Southeast Expressway.
259. The FEIS/FEIR describes regional land use and economic impacts of the Preferred Alternative; see Sections 4.4 and 4.6. Very specific impacts on outlying areas cannot be determined within the context of this document. There is also a more general discussion of project purpose in Section 1.3 MAJOR POLICY ISSUES.
260. An extensive evaluation of potential air rights development, including the extent of amenities included in the project, is discussed in Section 4.4 Joint Development of the FEIS/FEIR. A State backed development mechanism will be developed to provide future development capability, assist in developer selection, finance public open space, and enforce design guidelines. This mechanism will provide availability of front end financing, design integration with planning for development parcels, and adherence to plans.
261. A summary comparison of the air quality benefits/impacts of all alternatives is presented in Section 4.7 AIR QUALITY of the FEIS/FEIR. Also, the SUMMARY presents a tabular comparison of the alternatives.

262. Mitigating measures are discussed throughout the FEIS/FEIR with respect to construction materials movement, etc.; see Section 4.1 DESCRIPTION OF CONSTRUCTION. Measures to mitigate adverse construction period air quality impacts will be detailed during the design phase when detour routes are selected. Conformance with appropriate air quality standards will be required.
263. These noise barriers have all been rejected because of their potential adverse effects on the adjacent development. See Section 4.8 NOISE AND VIBRATION in the FEIS/FEIR for a discussion of barriers likely to be built.
264. Potential mitigation techniques are referred to in Section 4.8 NOISE AND VIBRATION of the FEIS/FEIR. The feasibility and effectiveness of such measures depend, however, upon the specific construction equipment and scenarios planned for the project. Therefore, a project-specific plan to mitigate construction noise will be developed during the design phase when project-specific construction noise computations can be made.
265. A plan for development of 20 acres of air rights above the depressed Artery will be worked out during the design phase in coordination with the BPA, City, State and private agencies. See Section 4.4.4 Joint Development for a description of this process.
266. Section 4.9 WATER RESOURCES has been reviewed to address this concern, based on consultation with the MDC (operators of the Deer Island and Nut Island treatment plants).
267. See Section 4.9.4 Construction Impacts of the Preferred Alternative for a discussion of dredging. Findings indicate that marine dredging required for the Preferred Alternative is significantly less than for other alternatives. The impacts were found similar in every way to a normal maintenance dredging project in Boston Harbor.
268. Effects on water quality and marine life resulting from the reduced tidal prism and increased flushing time are minimal. See Section 4.12.3 Wildlife in the FEIS/FEIR.
269. Alternative methods for disposal of excavated materials are discussed throughout 4.13 DREDGED AND EXCAVATED MATERIAL DISPOSAL. These include consideration of landfill covering or fill for restoration efforts.
270. These issues are addressed in Section 4.3 RELOCATION IMPACTS and also in Appendix 2-CONCEPTUAL RELOCATION PLAN REPORT.
271. Measures to mitigate loss of parking are discussed in Section 4.2.10 PARKING IMPACTS and are presented throughout Section 4.4 LAND USE; these measures include use of state-owned property in the vicinity of Haverhill Street (above the MRA Orange Line), or City owned property lying between Fulton Street and the approach to the Callahan Tunnel. In concert with the City, MDPH/SOTC is also exploring other options, such as allocation of space at nearby garages (i.e. Government Center Garage, Quincy Market Garage, Harbor Tower Garage, Bettez Garage) for North End residents and visitors, and providing bus shuttle service between these garages and the North End. Parking structures may also be constructed. Parking lot spaces displaced from under the Central Artery in the Financial District, Waterfront, and North End will be replaced by the project prior to commencement of construction. Specific parking impacts are described in Section 4.2.10 Parking Impacts.



massport

OFFICE OF AIRPORT DEVELOPMENT, AIRPORTS, 1000 WASHINGTON STREET, BOSTON, MA 02114

Mr. James Walsh
Division Administrator
Federal Highway Administration
Transportation Systems Center
55 Broadway
10th Floor
Cambridge, MA 02142

Mr. Robert J. McDough
Chief Engineer
Massachusetts Department of
Public Works
100 Hingham Street
Room 530
Boston, MA 02114

Dear Messrs Walsh and McDough:

Attached you will find additional comments on the Supplement to the Draft EIR/EIS on the Third Harbor Tunnel, Central Artery. We are also sending you a copy of the testimony presented by David Davis at the August 8 hearing.

If you have any questions on the contents of either of these or if we can provide further clarification, please call me.

Sincerely,

Norm J. Ferrelli

Norman J. Ferrelli
Director of Planning

MJF:clb

Enclosure

OPERATING: BOSTON LOGAN INTERNATIONAL AIRPORT; PART OF BOSTON GENERAL, CARGO AND PASSENGER TERMINALS; TOWN OF LYNN, BOSTON - WAREHOUSING FIELD
OFFICE: 1000 WASHINGTON STREET, BOSTON, MA 02114

August 22, 1983

Comments by Massport's Aviation and Planning Departments
on Supplement to Draft EIS/ETIS Third Harbor Tunnel/Central Artery

These comments supplement the remarks made by David Davis in his testimony on August 8th (attached). As noted by Mr. Davis, these comments were prepared by our Aviation and Planning Departments and refer primarily to the Logan roadway system.

(1) Construction Phasing -

Mr. Davis noted some of Massport's concerns regarding construction phasing. We would like to emphasize the need for specific time tables on construction impacts. What will be done and when will it be done, so we can guarantee that airport access is not negatively affected during construction.

We like a listing as to construction times, what will be done specifically during the am and pm peak hours, staging area requirements and haul routes.

(2) U-Turn - We are concerned that any temporary and permanent roadway linkage with a new tunnel at Logan retain the U-turn at the airport, so travellers who made the wrong turn need not go to the MBTA station to turn around. The U-turn, which has been in service for the past year or so, has proved to be beneficial to motorists and also has reduced intersection congestion at Logan.

(3) Access to Bird Island Plaza - Massport would like a new tunnel to improve access to Bird Island Plaza. Under Alternative 5A, as well as the other airport alignments, there is no direct access from the tunnel

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to Bird Island Plaza. If a direct connection to BIF is not possible, then a travel route that minimizes travel time and intersection-bottlenecks should be selected.

(4) Two Way Service Road -

The service road on the north side of the airport serves a very important function. It is necessary that we retain a two way service road to allow movements to and from the American Hanger site.

(5) Spill-Over Into East Boston Streets -

The traffic and air quality impacts in the no-build case could be started differently. It is questionable whether queues and delays will simply get longer. It is our opinion that increased queues at the Sumner Tunnel will exacerbate a problem that has been growing over the years (i.e., spill-over from the main highways to the East Boston city streets). This is not only done through Porter St., but a congested Sumner Tunnel will send traffic to I-A North to expand vehicular storage and prevent back-ups on the airport roadway system. When that occurs, some of that traffic will find its way through East Boston and Chelsea, despite the signing that routes traffic via the alternate route - Rt. 16 (Revere Beach Parkway) - via Ball Circle.

We realize that some of the spill-over effect has been included in the analysis of the East Boston streets. We think, however, that the spill-over effects have been understated in the Draft Supplemental.

The last issue "induced demand" will be treated more in detail, because we think it is critical we dispel the notion raised at the public hearings that since a new tunnel accommodates growth, it, therefore, causes growth.

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(6) Induced Traffic Due to a New Tunnel -

In the Draft Supplemental, it is stated that a new tunnel will induce overall traffic demand, including traffic to Logan. We do not quarrel with your Logan passenger traffic projections, since they were arrived at in consultation with my staff. We do, however, take issue with the concept of induced demand and the method by which it was projected in the traffic analysis.

(a) We feel that the terminology of induced demand is misleading.

Activity at Logan will grow at projected levels as you assumed with or without the existence of a new Cross Harbor Facility and ground travel demand will be consistent with these projections. Therefore, a new facility will not in and of itself induce or generate added ground travel as the terminology suggests, since this ground travel demand will exist anyway. Rather, the presence of a new tunnel will add to the capacity of the regional road network to accommodate ground travel demand. We are, therefore, speaking then in terms of accommodating demand rather than inducing demand.

For daily commuters, the concept of induced demand makes some sense.

That is, ease of ground access will shape the mode choice as long as adequate parking is available. A new tunnel can make it easier for north shore commuters to drive to and from Boston. For airport users, however, induced demand is a misleading concept, even if it refers only to growth in ground traffic not air passengers. Unlike commuters, airport users do not travel daily so they can factor in adequate delay times into their travel patterns. Such delays obviously result in increased user inconvenience, but not necessarily in additional

vehicle miles travelled. With the exception of the Blue Line, which is not constrained by highway capacity but serves a limited market, all other forms of public transportation will encounter the same traffic congestion as the private passenger vehicle. That is true for all bus, trolleys, car pools, etc., that use the tunnels. The increased hassles of getting to and from Logan will have little effect on mode choice, and not result in levels of mode diversion assumed in the Draft Supplemental.

(b) The second issue is the projected form and character of this demand that will be accommodated by a new tunnel. Your traffic analysis assumes that without a tunnel, ground travel congestion to Logan will worsen motivating Logan users to utilize non-automobile modes to access the airport. With a tunnel, congestion is abated and Logan users will opt to use automobiles at current mode shares. The increased level of auto demand accommodated by the new tunnel is made up of those Logan users who would otherwise be projected to use non-auto modes if a tunnel did not exist.

We agree that without a tunnel increasing congestion will yield greater diversions to non-automobile use, as projected. However, we would argue that despite a tunnel Logan users would continue to be diverted to non-automobile modes in excess of current levels which is contrary to your projection assumptions.

For instance, congestion in and of itself is not the sole determinant of Logan ground travel choice as your analysis assumes. As noted, with the exception of transit, other non-automobile modes share the

same road network as the automobile and are equally affected by congestion. Under these conditions, there would be little incentive to travel by one mode over the other.

It has been our experience that the increased availability and improved quality of alternative modes to Logan have been in important factors in yielding mode travel diversions from the automobile over the last decade. The very existence of a tunnel would improve still further the quality service and provide the potential to expand new services such as shuttles to downtown and South Station.

With or without a tunnel we would expect and will certainly continue to seek creative improvements to the regional transit system.

We would also expect that disincentive to the use of the automobile, such as increasing fuel cost will continue to motivate Logan users to seek alternative modes of ground travel.

We would urge you to reconsider the basis for the projected level of automobile traffic that will be accommodated by a new Cross Harbor Facility given the prospect for continued improvements in alternative non-automobile modes as well as the continued disincentives to automobile use.

TESTIMONY OF DAVID W. DAVIS

AT

PUBLIC HEARING ON PROPOSED THIRD HARBOR
CROSSING/RECONSTRUCTED CENTRAL ARTERY

AUGUST 8, 1983

MY NAME IS DAVID W. DAVIS, AND I AM THE EXECUTIVE DIRECTOR OF THE MASSACHUSETTS PORT AUTHORITY. MASSPORT WELCOMES THE OPPORTUNITY TO TESTIFY AT THE PUBLIC HEARING ON THE THIRD HARBOR TUNNEL/CENTRAL ARTERY PROJECT.

THE PLANNING PROCESS FOR ADDRESSING REGIONAL TRANSPORTATION NEEDS, IN A MANNER THAT MINIMIZES COMMUNITY IMPACTS, HAS BEEN A VERY LONG ONE. BUT OVER THE LAST SEVERAL MONTHS, IT HAS BEEN AN ACCELERATED AND INCREASINGLY COMPREHENSIVE AND POSITIVE PROCESS. WE AT MASSPORT ARE PLEASED THAT ATTENTION HAS BEEN GIVEN TO REGIONAL TRAFFIC PROBLEMS IN BOTH THE NORTH-SOUTH AND EAST-WEST DIRECTIONS. IN THAT REGARD, WE ARE PLEASED THAT THE LONG STANDING CENTRAL ARTERY AND THIRD TUNNEL PROBLEMS ARE NOW BEING ADDRESSED. AS I WILL NOTE IN THIS TESTIMONY, MASSPORT HAS MANY CONCERNS, BUT LOOKS FORWARD TO THE RESOLUTION OF THESE CONCERNS IN THE PREPARATION OF THE FINAL EIR/EIS ON THIS PROJECT.

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IT IS MY VIEW THAT THE FUTURE VIABILITY OF SEVERAL IMPORTANT MASSPORT FACILITIES, WHICH ARE CRUCIAL TO THE REGIONAL ECONOMY, IS BEING SERIOUSLY THREATENED BY THE INABILITY OF OUR CURRENT TRANSPORTATION SYSTEM TO PROVIDE THE NECESSARY LEVEL OF GROUND ACCESS. THIS IS TRUE AT THE COMMERCIAL/INDUSTRIAL SITE IN SOUTH BOSTON, WHERE WE HAVE MANY MARITIME AND DEVELOPMENT PROPERTIES, SUCH AS BOSCOM, FISH PIER, MASSPORT MARINE TERMINAL, CONLEY TERMINAL AND OTHERS. THIS IS TRUE FOR MORAN TERMINAL AND THE TOBIN-MYSTIC BRIDGE. IT IS CERTAINLY TRUE AT LOGAN AIRPORT WHERE OUR CONSERVATIVE PROJECTION OF 402 GROWTH IN PASSENGER TRAVEL DURING THE NEXT TWO DECADES CANNOT POSSIBLY BE ACCOMMODATED AT A REASONABLE LEVEL OF SERVICE BY TODAY'S BARELY FUNCTIONAL GROUND TRANSPORTATION SYSTEM. I DO NOT MEAN TO IMPLY THAT THE PASSENGERS WILL NOT TRAVEL TO LOGAN IF ACCESS IMPROVEMENTS ARE NOT FORTHCOMING. WE NEED ONLY LOOK TO NEW YORK TO APPRECIATE THE EXTREMES OF DELAY AND CONGESTION THAT AIR PASSENGERS WILL ENDURE TO FULFILL THEIR TRAVEL NEEDS. WHAT I DO MEAN TO SAY VERY CLEARLY IS THAT WITHOUT MAJOR IMPROVEMENTS IN ALL TRANSPORTATION MODES, BOSTON WILL SURELY FALL PREY TO THE EXTREME CONGESTION AND DELAY LEVELS PORTRAYED IN THE ENVIRONMENTAL IMPACT STATEMENT (EIS/EIR) WITH ALL OF THE ATTENDANT COSTS MEASURED IN ECONOMIC LOSSES, INCREASED AIR POLLUTION, AND SERIOUS COMMUNITY IMPACTS.

MASSPORT SEES THE NEED TO IMPROVE PUBLIC TRANSPORTATION TO OUR FACILITIES, AND HAS WORKED TO IMPLEMENT NEW MEASURES. THAT IS WHY SEVERAL YEARS AGO, MASSPORT UNDERTOOK A STUDY ON THE EFFECTS OF MAJOR TRANSIT EXTENSIONS ON THE LOGAN MODE SPLIT (I.E.

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THE PERCENTAGE OF PEOPLE USING LOGAN WHO ARRIVE OR LEAVE BY PUBLIC TRANSPORTATION). WE INVESTIGATED THE EFFECTS OF TWO BLUE LINE EXTENSIONS - ONE TO CHARLES STREET OR TO PARK STREET, AND THE OTHER FROM THE AIRPORT STATION TO THE CENTRAL MALL AT LOGAN. OUR STUDY CONVINCED US THAT GOOD PUBLIC TRANSPORTATION, - AS NEEDED AS IT IS, - WILL NOT DO THE JOB BY ITSELF. FOR EXAMPLE, THE TWO BLUE LINE EXTENSIONS WOULD CHANGE THE LOGAN MODE SPLIT BY 3 TO 6%. THAT IS, THE PRESENT 6% OF LOGAN'S PASSENGERS USING THE BLUE LINE CAN BE INCREASED TO 9% OR POSSIBLY TO 12% BUT NOT MUCH MORE. OTHER PUBLIC TRANSPORTATION CHANGES WILL PROBABLY RESULT IN EVEN SMALLER INCREASES. HENCE, WE CAN SAY THAT PUBLIC TRANSPORTATION SOLUTIONS BY THEMSELVES WILL NOT BE SATISFACTORY AND NEED TO BE COUPLED WITH OTHER GROUND ACCESS IMPROVEMENTS.

WITH REGARD TO HIGHWAYS, IT IS CLEAR TO MASSPORT THAT CENTRAL ARTERY CONGESTION IS NOW THE MAJOR IMPEDIMENT TO EFFICIENT AND RELIABLE ACCESS TO BOTH LOGAN AND TO OUR DEVELOPMENT AND MARITIME PROPERTIES. HENCE, WE CONCUR WITH THE DRAFT SUPPLEMENTAL REPORT THAT THE ESSENTIAL TASK IN REVITALIZING OUR GROUND TRANSPORTATION NETWORKS IS THE WIDENING AND DEPRESSION OF THE CENTRAL ARTERY. WITHOUT RESOLUTION OF THE ARTERY'S LIMITATIONS, ALL OTHER IMPROVEMENTS CONSIDERED IN THE STUDY ARE SERIOUSLY HANDICAPPED.

ASSUMING SUFFICIENT RESOURCES ARE AVAILABLE, WE WILL NEED TO ADDRESS BOTH THE EAST-WEST AS WELL AS THE NORTH-SOUTH TRAFFIC PROBLEMS. FOR EXAMPLE, I DO NOT THINK THAT THE IMPROVEMENTS TO BE GAINED BY MODERNIZING THE CENTRAL ARTERY ALONE WILL BE

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SUFFICIENT TO MEET THE DEMAND FOR TRAVEL TO MASSPORT'S FACILITIES. THE SUCCESSFUL ONE-WAY TOLLS PROGRAM HAS PROVIDED STRONG EVIDENCE OF THE VERY REAL IMPROVEMENTS IN TUNNEL TRAFFIC FLOWS THAT WE CAN EXPECT FROM RESOLUTION OF THE ARTERY PROBLEM. BUT EVEN IF THE EXISTING TUNNELS COULD OPERATE AT THEIR UNCONSTRAINED CAPACITY, AND IF WE ACHIEVE THE BENEFITS OF ADDITIONAL TRANSIT IMPROVEMENTS, WE WILL REQUIRE ADDITIONAL CAPACITY TO SERVE OUR FACILITIES. FOR THAT REASON, I WOULD LIKE TO BE RECORDED IN FAVOR OF A THIRD HARBOR CROSSING. HOWEVER, I AM NOT PREPARED TO SUPPORT THE SELECTION OF ANY TUNNEL JUST FOR THE SAKE OF PROVIDING ADDITIONAL CAPACITY. THE PUBLIC DISCUSSION OF A THIRD HARBOR TUNNEL OVER THE PAST TEN YEARS HAS BEEN PLAGUED BY FAILURE TO RECOGNIZE THE LEGITIMATE ENVIRONMENTAL CONCERNS OF COMMUNITY RESIDENTS ON BOTH SIDES OF THE HARBOR AND BY FAILURE TO RECOGNIZE THE ACCESS REQUIREMENTS OF THE SOUTH BOSTON MARINE DEVELOPMENTS. BECAUSE OF THIS, PRIOR TUNNEL PROPOSALS HAVE BEEN BOTH POLITICALLY INFEASIBLE AND HAVE NOT SERVED IMPORTANT TRANSPORTATION NEEDS. BUT THERE IS A PROPOSAL THAT WORKS AND MASSPORT CAN SUPPORT-I.E., A NEW TUNNEL TO LOGAN THAT ALSO PROVIDES EFFICIENT ACCESS TO THE COMMERCIAL/INDUSTRIAL SECTIONS IN SOUTH BOSTON.

EARLY IN THIS PROCESS, MASSPORT WROTE TO THE EXECUTIVE OFFICE OF TRANSPORTATION AND CONSTRUCTION REQUESTING THAT THE THIRD HARBOR CROSSING AND SEAPORT ACCESS ROAD BE SEEN AS ONE INTEGRAL PACKAGE. MASSPORT APPRECIATES THE RESPONSE BY EOTC TO OUR REQUEST. WE ARE CONCERNED, HOWEVER, THAT THE SEAPORT ACCESS ROAD IN ALTERNATIVE 5A DOES NOT PROVIDE THE MOST EFFICIENT SOLUTION.

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IN THAT REGARD, MASSPORT THINKS THAT THE MODIFICATION OF ALTERNATIVE 5A (ON PG. 15 IN THE DRAFT SUPPLEMENTAL EIR/EIS), IS FAR SUPERIOR SINCE IT ALLOWS TWO ACCESS/EGRESS POINTS - FOR COMMERCIAL AND INDUSTRIAL TRAFFIC, AND THUS, WILL BE MUCH MORE EFFECTIVE IN GETTING TRUCK TRAFFIC OFF THE STREETS IN THE RESIDENTIAL SOUTH BOSTON COMMUNITY. AND THAT IS SOMETHING WHICH THE SOUTH BOSTON RESIDENTS AND MASSPORT BOTH DESIRE.

THERE IS AN IMPORTANT PUBLIC TRANSPORTATION POTENTIAL IN THE COMBINED SEAPORT ACCESS ROAD AND TUNNEL. A NEW TUNNEL AND SEAPORT ACCESS ROAD SHOULD ENABLE US TO ACCOMMODATE ADDITIONAL PUBLIC TRANSPORTATION VEHICLES TO AND FROM LOGAN AS WELL AS PRIVATE PASSENGER CARS AND TRUCKS. FOR EXAMPLE, THE PROPOSED TUNNEL AND ROADWAY SYSTEM CAN PROVIDE AN IMPETUS FOR NEW PUBLIC TRANSPORTATION POSSIBILITIES FROM THE TRANSPORTATION CENTER IN THE SOUTH STATION AREA TO LOGAN. IN CONJUNCTION WITH THE TRAFFIC RELIEF GAINED BY WIDENING AND DEPRESSING THE CENTRAL ARTERY, IT OFFERS THE POTENTIAL TO INSTITUTE NEW PUBLIC BUS SERVICE TO OTHER TRANSPORTATION CENTERS, SUCH AS NORTH STATION AND HAY MARKET SQUARE.

IN SUPPORTING THIS TUNNEL ALIGNMENT, I WOULD LIKE THE RECORD TO SHOW THAT DESPITE ITS STRENGTHS, A NUMBER OF CONCERNS MUST STILL BE RESOLVED.

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THE LOCATION OF THE TOLL PLAZA AND VENT STACK AT THE EAST BOSTON PORTAL AS SHOWN IN ALTERNATIVE 5A IS NOT ACCEPTABLE TO MASSPORT. GIVEN THE EXTREMELY CONGESTED LANDSIDE FACILITIES AT THE AIRPORT, I DO NOT FEEL WE CAN AFFORD TO DEVOTE ADDITIONAL AREA TO A TOLL PLAZA DISPLACING LEGITIMATE AIRPORT USES TO OFF-AIRPORT SITES. THE PROPOSED LOCATION OF THE TOLL PLAZA AND VENT STACK, ALTERNATIVE 5A MODIFIED SEEMS TO RESOLVE THIS LAND USE PROBLEM WHILE, AT THE SAME TIME, OFFERING SUBSTANTIAL IMPROVEMENTS IN AIR QUALITY. ALTHOUGH THE FINAL ENVIRONMENTAL IMPACTS OF THIS MODIFIED ALTERNATIVE ARE NOT YET AVAILABLE, THE IMPROVEMENTS SEEM INTUITIVELY CLEAR SINCE THE RELOCATED TOLL PLAZA WILL BE AROUND SEVEN TIMES FURTHER AWAY FROM THE CLOSEST COMMUNITY SENSITIVE RECEPTOR IN SOUTH BOSTON THAN IT IS IN EAST BOSTON UNDER ALTERNATIVE 5A. ANY IMPACT FROM THE TOLL PLAZA WILL BE EVEN FURTHER REDUCED OR ELIMINATED SINCE ALTERNATIVE 5A MODIFIED INCLUDES A ONE-WAY TOLL COLLECTION SCHEME. THE REDUCTION IN THE NUMBER OF TOLL BOOTHS PLUS THE LARGE DISTANCE FROM THE NEAREST PART OF THE SOUTH BOSTON RESIDENTIAL COMMUNITY (OVER A 1/2 MILE), WILL INSURE THAT THE SOUTH BOSTON RESIDENTS WILL NOT BE EXPOSED TO NEGATIVE IMPACTS DUE TO THE RELOCATION OF THE TOLL PLAZA.

THERE ARE THREE OTHER ISSUES THAT MASSPORT WOULD HAVE THE CONSULTANTS ADDRESS IN THE PREPARATION OF THE FINAL EIR/EIS, WHICH ARE SPECIFICALLY RELATED TO IMPACTS AT LOGAN AND MASSPORT'S DEVELOPMENT AND MARITIME PROPERTIES.

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(1) CONSTRUCTION PHASING

WHILE WE ARE PREPARED TO WORK WITH YOU, MASSPORT AND ITS TENANTS NEED TO KNOW PRECISELY THE CONSTRUCTION PHASING OF ANY SCHEME PROPOSED ON MASSPORT PROPERTIES. IT IS IMPERATIVE THAT FULL SERVICE TO AND FROM LOGAN BE MAINTAINED AT ALL TIMES IN ORDER TO PROVIDE EFFICIENT MOVEMENT FOR LOGAN'S TENANTS AND USERS, AND TO INSURE THAT TRAFFIC, DURING THE CONSTRUCTION PERIOD, DOES NOT CONGEST EITHER THE AIRPORT ROADWAYS OR THE STREETS IN THE RESIDENTIAL COMMUNITY OF EAST BOSTON. IT IS IMPORTANT THAT THE CONSTRUCTION IMPACTS ON AIR FREIGHT, AIR PASSENGERS, HANGERS, AND ROADWAYS BE KEPT TO A MINIMUM. IT IS ALSO IMPORTANT THAT FULL ACCESS BE MAINTAINED TO ALL MASSPORT MARITIME AND DEVELOPMENT PROPERTIES TO AVOID TRUCK MOVEMENTS THROUGH THE RESIDENTIAL COMMUNITY OF SOUTH BOSTON.

(2) LOGAN ROADWAY SYSTEM

A THIRD HARBOR CROSSING SHOULD LINK INTO THE LOGAN ROADWAY SYSTEM IN A MANNER THAT REDUCES ADVERSE COMMUNITY AND ENVIRONMENTAL IMPACTS, AND PROVIDES ADEQUATE SERVICE TO LOGAN USERS. IN ORDER TO HAVE EFFICIENT TRAFFIC FLOWS ON THE LOGAN ROADWAY IN BOTH THE NORTH/SOUTH AS WELL AS THE EAST/WEST DIRECTION, IT IS IMPERATIVE THAT GRADE SEPARATION BE AN INTEGRAL PART OF THE THIRD HARBOR CROSSING CONSTRUCTION PROGRAM.

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I AM ALSO REQUESTING THAT MY PLANNING AND AVIATION STAFF PROVIDE FOR THE RECORD DETAILED COMMENTS ON THE POSSIBLE IMPACTS OF THE THIRD HARBOR TUNNEL ON THE LOGAN ROADWAY SYSTEM THAT SHOULD BE ADDRESSED IN THE FINAL EIR/EIS.

(3) RELOCATION AND DISRUPTION COSTS

IT IS ALSO IMPERATIVE THAT MASSPORT HAVE A FULL ASSESSMENT OF DISLOCATION AND RELOCATION COSTS FOR EACH PART OF THE CONSTRUCTION PROGRAM. MASSPORT WANTS ANY CONFLICTS BETWEEN THE COMMONWEALTH AND MASSACHUSETTS TECHNOLOGY CENTER, AIR FREIGHT FACILITIES, EASTERN AIRLINES (AT THE RESERVATIONS CENTER, THE SOUTHWEST TERMINAL, AND AIR FREIGHT AREA), OR ANY OTHER LOGAN TENANT, BE RESOLVED AS SOON AS POSSIBLE IN A EQUITABLE AND EXPEDITIOUS MANNER.

MASSPORT ALSO URGES THAT ANY CONFLICT WITH THE TENANTS ON THE MARITIME/DEVELOPMENT PROPERTIES BE QUICKLY RESOLVED. FOR EXAMPLE, THE TOLL PLAZA ON THE DOWNTOWN SIDE (SKETCHED FOR ALTERNATIVE 5A MODIFIED) MUST BE DESIGNED IN A MANNER THAT ALLOWS FULL TRUCK LOADING DOCKS FOR TURNER FISHERIES, AND RELOCATES THE RAILROAD TO THE SOUTHERN PART OF COMMONWEALTH FLATS.

IN ADDITION TO THE SPECIFIC POINTS RAISED ABOVE, MASSPORT ALSO OFFERS A FEW COMMENTS ON ONE OF THE WIDER ISSUES--ACCESS FLEXIBILITY.

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WE ARE CONCERNED ABOUT THE OVERALL DESIGN OF THE LINKS BETWEEN THE RECONSTRUCTED CENTRAL ARTERY, THE NEW HARBOR CROSSING, AND THE SUMNER/CALLAHAN TUNNELS. MASSPORT WOULD LIKE TO SEE ALL THE TUNNEL CONNECTIONS DESIGNED IN A MANNER THAT PROVIDES THE LOGAN USERS WITH MAXIMUM FLEXIBILITY, SO AN ALTERNATE ROUTE IS AVAILABLE IN THE EVENT THAT ONE OF THE TUNNELS IS CONGESTED DUE TO AN ACCIDENT OR BREAK-DOWN. THE PRESENT DESIGNS SHOULD BE MODIFIED TO ALLOW FOR THAT FLEXIBILITY. FOR EXAMPLE, IT SHOULD BE POSSIBLE TO HAVE DIRECT MOVEMENTS BETWEEN THE RECONSTRUCTED CENTRAL ARTERY AND THE CALLAHAN AND SUMNER TUNNELS IN ALL DIRECTIONS, AND THE SEAPORT ACCESS ROAD AND NEW TUNNEL SHOULD PROVIDE FOR NORTHBOUND MOVEMENT ON TO THE CENTRAL ARTERY.

LET ME CLOSE THIS TESTIMONY BY AFFIRMING AGAIN OUR SUPPORT FOR A RECONSTRUCTED CENTRAL ARTERY, A NEW HARBOR CROSSING TO LOGAN, AND A NEW SEAPORT ACCESS ROAD (WITH LINKS TO BOTH COMMERCIAL AND INDUSTRIAL AREAS). WE BELIEVE THESE PROJECTS ARE NECESSARY TO MASSPORT, TO THE REGION, AND TO THE COMMUNITIES. WITHOUT THEN, THE BOSTON REGION WILL HAVE SERIOUS TRAFFIC PROBLEMS IN THE FUTURE. WITH THEM, THE REGION WILL BE ABLE TO MOVE AHEAD AS IT SHOULD AND MUST.

RESPONSE TO COMMENTS BY MASSPORT (August 22, 1983)

273. The Commonwealth concurs with Mr. Davis concerning the importance of these issues. The construction staging work developed for the Eastern operations area was thorough, and in unusual detail for an FETIS/FETIR. Further details of construction staging and scheduling plans is appropriately the subject of the design phase. These plans will be coordinated with Massport.
274. In design work underway to improve the local airport connections in the Preferred Alternative, solutions seem imminent for several problems, such as a more direct "right-turn" to BIF/SW service area. No such solution has yet been found for the lack of a U-turn return move for circulation among terminals. However, the inclusion of an at-grade separation at Cross Road may make the 48th ramp an acceptable location for this traffic move. Alternatively, the return moves may be made at-grade over the Cross Road.
275. Design work to date does not suggest that a direct connection from the Tunnel to BIF is feasible. However, the present design brings about a major improvement in the quality of access from the south and west to BIF, and to all airport real estate. Further consideration of this movement will be made during the design phase.
276. The two-way service road has been provided from the Cross Road north.
277. Driver familiarity with the area and roadway network is likely to continue the practice of use of local streets to avoid the congestion resulting from the No-Build Alternative. The traffic prediction methods do not underestimate increases in spillover traffic resulting from overloads on the main line facility, and this phenomenon is specifically discussed in Sections 4.3 MAJOR POLICY ISSUES and 4.2 TRANSPORTATION OF THE FETIS/FETIR.
278. The FETIS/FETIR has been revised and restructured to deal with this problem in the SDEIS/SDEIR. We concur that the reader could seriously misunderstand the meaning of the 12,900 trips; this is clarified in Section 1.3 and Section 4.2.5. The 12,900 vehicles refers to modifications in the average occupancy rates of rubber-tired vehicles going to the Airport, a relationship derived empirically. It does not refer to a directly corresponding loss in public transportation; it largely refers to changes in auto occupancy rates. In fact, the FETIS concludes that the project could bring an increase of 20 percent in public transportation usage.
279. The FIS makes the conservative assumption of increases in trips to Logan, due to lessening of the impediment of congestion on auto use; these are conservative, cautious forecasts before addition of the bus ramps. The Preferred Alternative then adds a radical program of improvement of public transportation, as a program to mitigate against - and perhaps eliminate - the auto growth forecast in the previous scenario. The Preferred Alternative incorporates the proposals included in Massport's last paragraph.
280. Turner Fisheries' loading dock will be moved, and their internal street reconfigured to ensure their continued operation. The Fall River Mill will be relocated south of the proposed project alignment.
281. The interchange of the Sumner Tunnel with the proposed operations Central Artery is designed to provide northbound connections. Vehicles can proceed from the Sumner Tunnel into the southbound Central Artery via local streets. Northbound vehicles from the Third Harbor Tunnel can proceed to northbound Central Artery via Northern Avenue.

CITY OF BOSTON
OFFICE OF THE MAYOR
CITY HALL BOSTON



KEVIN M. WHITE
Mayor

August 22, 1983

Mr. James Walsh
Division Administrator
Federal Highway Administration
35 Broadway, 10th Floor
Cambridge, Massachusetts 02134

Dear Mr. Walsh:

After careful review of the Supplement to the Draft Environmental Impact Statement/Report on the proposed depression of the Central Artery, and after extensive community input from impacted neighborhoods, I wish to extend my endorsement for the widening and depression of the Central Artery.

I favor a depressed Central Artery because it will reduce traffic congestion throughout the downtown core and reduce air and noise pollution in Boston. Elimination of the elevated roadway will also remove a blighting physical barrier from our downtown. In doing so, we will reunite the city with its waterfront.

This project takes on added importance when we consider the major reconstruction required on the Central Artery in the future. To rebuild an elevated roadway that does not address the city's transportation needs, present or future, would be a waste of public funds.

There is no doubt in my mind that the existing congestion on the Central Artery is acting as a deterrent to economic development in this city and in this region. We should not tolerate any component in our transportation system which is an obstacle to economic growth. In fact, as Mayor of Boston, I feel the depression of the Artery will provide us with development parcels that could generate a new era of development in this city. The Boston Redevelopment Authority, the city planning agency, should play a lead role in formulating a development program for these air-rights parcels.

With respect to the proposed Third Harbor Tunnel, I am strongly opposed to both the East Boston railroad and Jeffries Point Cove alignments because of their destructive effects on the East Boston community. I also have serious reservations about the impact of the airport alignment on East Boston Stadium. In fact, that alignment is unacceptable as currently proposed. The proposed Third Harbor Tunnel, however, is a good alternative for crossing and future growth. The Central Artery is the only element of the project that can only be addressed by policies and programs of the Commonwealth of Massachusetts. Finally, I could never support any tunnel alignment unless and until there is a prior commitment to depress and widen the Central Artery.

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In conclusion, I believe that the depression and widening of the Central Artery will be a significant and necessary improvement to the transportation system of Boston. I am confident that the City of Boston's economic growth continues while we improve the quality of life for residents of and visitors to the Downtown Core.

Sincerely,
Kevin M. White
Kevin M. White
Mayor

RESPONSE TO COMMENTS BY THE CITY OF BOSTON OFFICE OF THE MAYOR
(August 22, 1983)

282. The Boston Redevelopment Authority will play a major role in establishing guidelines and criteria for development of the air-rights above the depressed Central Artery, see Section 4.4.4 Joint Development.

283. Consistent with the policies requested by the City of Boston, the Preferred Alternative avoids construction in Jeffries Cove and, in the long-term, benefits the East Boston Memorial Stadium. See Section 5.1.1 East Boston Memorial Stadium in the FEIS/FEIR. For example, the reconstruction of a portion of open space at the East Boston Memorial Stadium and the overall addition of 3 acres of land to the East Boston Memorial Stadium is incorporated into plan design as part of 4(f) mitigation. The issue of increased roadway capacity and its effect on airport growth is addressed in Section 1.3. MAJOR POLICY ISSUES, and again in Section 4.2 TRANSPORTATION in the FEIS/FEIR. A program to review the impact of zoning and other land use control mechanisms (including various de facto licensing by Massport of off-airport industrial uses) will be undertaken immediately as one element of a total program of mitigation to be included as an integral element of the Preferred Alternative. Lifting the EPA ban on increasing on-airport parking is also being pursued by the Commonwealth.

284. In the Preferred Alternative, the Commonwealth makes a policy commitment to construct both facilities, with initial construction starting on both elements simultaneously, consistent with the comment by Mayor White.

Revised

August 22, 1983

Mr. James Walsh
Division Administrator
Federal Highway Administration
35 Broadway, 10th Floor
Cambridge, Massachusetts 02142

Dear Mr. Walsh:

After an extensive review of the material and data available, I am forwarding to you my comments in regards to the SDEIS/SEIR of the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93 and a report for your use prepared by this department in reaction to North End concerns about the Traffic, Parking and Access Impacts on the North End due to the proposed Central Artery depression.

With the continued economic growth of the region and with completion of most of the segments of the Interstate Highway System, significant increases in highway volumes have been experienced, and projections for the future indicate this demand will continue to increase. Clearly, there is a need to preserve and maintain the important balance of transportation modes by the implementation of major policy initiatives and substantial financial commitments to the transportation system of the Boston area. Planning studies conducted in the 1970's indicated the future need to add to the through highway capacity of this part of the region, and to implement improvements designed to reduce the growing deficiencies in highway operations in the core area. Almost all of the proposals offered over the years failed to address the fundamental problems of the Central Artery bottleneck, or were not considered in the context of the total regional transportation system.

After careful examination of the six alternatives considered in the SDEIS, I believe option 5A, Design Modification, will best serve the future transportation needs of the City of Boston and the region. This alternative offers the four major improvements desired by the City of Boston Traffic and Parking Department:

- 1) Increase in the number of vehicle travel lanes in the core area to handle the present and future traffic needs of the City.



Kenneth M. Whelan, Mayor / TRAFFIC AND PARKING DEPARTMENT / Boston City Hall / City Hall Plaza 02201

- 2) Satisfaction of demand for additional cross harbor capacity.
- 3) Improved connections with other parts of the regional highway system.

- 4) The depression and widening of the Central Artery results in better and more efficient operation of the Downtown street system, with disruptions due to construction held to a minimum.

It should be noted that the depression and widening of the Central Artery is of more importance than a third harbor tunnel, and that a third tunnel alone is unacceptable.

The City of Boston Traffic and Parking Department looks forward to a continued co-operative effort with the appropriate state agencies in further identifying the negative impacts to the existing neighborhood and the project limits, and developing appropriate mitigating measures to avoid, minimize or compensate for the impacts. The specific concerns in this area is our goal to further emphasize Herald Street in the South End as a major arterial connector from the Central Artery to Copley Place and the Back Bay.

For your information I have enclosed three supporting documents:

- a) An earlier letter to Secretary Salvucci on the Central Artery.
- b) An analysis that supports in detail my overall position.
- c) A copy of a plan to mitigate traffic and parking impacts in the North End area from the Central Artery proposal.

Sincerely,

John A. Vitale
John A. Vitale
Commissioner

JAV:td

Enclosure

cc: Mr. Frederick Salvucci, Secretary of Transportation and Construction
Mr. James Harte, Secretary of Environmental Affairs
Mr. Robert J. McDonough, Chief Engineer, Massachusetts Department of Public Works

RESPONSE TO COMMENTS BY THE CITY OF BOSTON TRAFFIC AND PARKING DEPARTMENT
(August 22, 1983)

285. The City of Boston Traffic and Parking Department will continue to have input into this project during the design phase, at which time the contents of their report will be evaluated further.

286. The Preferred Alternative is consistent with the City's goal of emphasizing Herald Street as a major arterial connector. Specifically, the 5A Modified Alternative has been redesigned since the publication of the SDEIS/SEIR to emphasize the use of Herald Street as a bypass of the South End residential area, at the request of the City and of affected residential groups.

August 22, 1983

CITY OF BOSTON
TRAFFIC AND PARKING DEPARTMENT

SUBJECT: EVALUATION OF ALTERNATIVES
THIRD HARBOR TUNNEL STUDY REPORT

As a result of an extensive review of the materials and data in the SDIS and discussions with many parties concerned with the impact of implementation of recommended improvements, an evaluation of the traffic operations impacts of the several alternatives on the surface street system of the City of Boston has been completed.

The SDIS refers to many of the alternatives which have been considered in this study as being "not recommended" or "not feasible". The reasons for these conclusions and reasons for selection seems to be reasonably clear. The alternatives evaluated in this memo are the following:

- Alternative 1 - No Build with Central Artery Deck Replacement
- Alternative 1A - Central Artery Depression and Cross-Harbor Eastern Tunnel
- Alternative 1B - Central Artery Depression and Cross-Harbor South Boston Tunnel
- Alternative 1C - Central Artery Depression and Cross-Harbor Eastern and South Boston Tunnels
- Alternative 1D - Design Modification - Central Artery Depression and Cross-Harbor Tunnel from South Boston to Bird Island Flats
- Alternative 6 - Central Artery Depression Without Cross-Harbor Tunnel

This evaluation includes a functional analysis of the roadway improvements proposed in the Core Area. Then, the advantages and disadvantages of each of the Alternatives is discussed separately. In conclusion, a preferred alternative is selected and discussed in detail.

No Build Concept

Because the Central Artery must be scheduled for a major renovation in the next four years if the roadway is not widened and depressed, there really is not any no build alternative.

The highway system of which the Central Artery is a part serves a distinctly regional function as part of Interstate Route 93, and at the same time is the major collector-distributor access facility to the Boston CBD and adjacent areas. The highway system is expected to carry over 100,000 vehicles per day, this system now carries over 165,000 vehicles per day and is expected to carry over 173,000 vehicles per day in the next 25 years.

The millions of hours of delay encountered annually on the present system result in substantial economic losses to the Boston area, and cause considerable social and economic problems in residential and commercial neighborhoods in the City of Boston.

The no build concept anticipates an expenditure of more than \$13 million for physical and cosmetic improvements which will require total fewer years of construction disruption than the build alternatives. However, during the construction period, it will be necessary to close at least one lane of traffic at all times, resulting in substantial reductions in capacity and massive inconveniences to users. When completed, these improvements will do little to reduce the increasing congestion and will not add to the total capacity of the regional or local transportation system.

The Need for Highway Improvements in the Core

The Boston Transportation Planning Review concluded in 1972 that the provision of high quality radial transportation in the Core should be primarily by public transportation and that the Central Artery and a Third Harbor Crossing emerged as promising highway investments. Since then, major policy initiatives have been implemented. These commitments have made transit the predominant mode of access into the Boston CBD.

With the continued economic growth of the region and with completion of most of the segments of the Interstate Highway System, significant increases in highway volumes have occurred, and projections for the future indicate that this demand will continue to increase. There is a need to preserve and maintain the important balance of transportation modes by the implementation of major policy initiatives and substantial financial commitments to roadway operations in the Boston Core area.

Detailed planning studies in the 1970's presented analysis supporting the need to implement improvements designed to reduce the growing deficiencies in highway operations in the Core Area.

Out of these studies, four salient factors have emerged. Each of these factors is briefly stated as follows, and then is discussed in more detail in separate

sections:

- 1) There must be an increase in the number of lanes available for traffic through the Cove Area to handle the present and future traffic demands of the City of Boston.
- 2) There is a need to satisfy present and future increases in demand for cross-harbor movements.
- 3) Construction and delay on the expressway type facilities is encouraging some forcing traffic to utilize local streets in commercial and residential areas as by-pass routes.
- 4) Major bottlenecks occur due to inadequate connections with other parts of the regional highway system at the northerly and southerly ends of the Central Artery.

Depression and Widening of the Central Artery

Recognition of the advantages of many proposals made over the years to improve traffic flow in the Downtown Crossing area has led to the present study. The study addresses the fundamental problem of the Central Artery bottleneck. Proposals have been advanced to widen the Artery aboveground, to double deck the existing facility, to operate the present Artery one-way and construct a new one-way facility parallel to it, to tear it down and build a new facility in a tunnel section, and even to eliminate the facility and send the traffic elsewhere. None of these proposals were practical, and most of them were not considered in the context of the total regional transportation system.

The DTIS/DXIS published in December of 1982 and the SDEIS now under review have documented in considerable detail the capacity constraints and the number of hours of unacceptable levels of service on the existing Downtown street system. While it is anticipated that a Third Harbor Tunnel would improve operating conditions in the existing tunnels, it will not alleviate the existing unsatisfactory operating conditions on the Central Artery.

The fact that Alternatives 1A, 3A and 6 in the SDEIS each include a proposal to widen the Central Artery is an indication of the significance attached to this need. A proposal for increasing the capacity of the Central Artery is considered one of the most important factors in the support of continued vitality in Boston's CBD and its adjacent areas.

The proposed depression of the Central Artery is made practical and feasible by the construction procedures to be used. Slurry walls and transverse support structures will be constructed along the length of the Central Artery. The existing sections of the Artery while maintaining full use of the existing facility. Only after all traffic movements are in operating in the new tunnel sections will the existing elevated structure be removed.

The construction staging offers far reaching advantages to the businessmen and commercial interests who depend so heavily on this roadway access for their business. The staging offers the opportunity to increase the efficiency of the roadway system. One of the significant traffic benefits will be the creation of a continuous Surface Artery from Kneeland Street to Causeway Street.

The most important consideration relating to the operation of the street system in the City of Boston is the fact that the number of hours of severe congestion -- the Artery, which causes back-ups and delays on the adjacent surface streets -- would be substantially reduced. The number of accidents and the number of accidents would also be significantly reduced.

The importance to the City of Boston of increasing the capacity and operating efficiency of the Central Artery cannot be overstated. The proposals outlined in Alternatives 1A, 3A and 6 represent significant improvements vital to the entire City of Boston.

Cross Harbor Options

There are basically three cross-harbor options, with several modifications, to be considered. Alternatives 1A and 3A call for the so-called easterly tunnel. A modification of Alternative 3A calls for a tunnel to the Bird Island Plaza, while Alternative 6 has no tunnel.

The easterly tunnel, also referred to as the Jeffries Cove alignment, comes up to the surface at a toll plaza located on the transport property just north of the Artery. The tunnel crosses the harbor and terminates at the Artery at the Jeffries Cove area. Concerns have been expressed that the easterly tunnel alignment causes problems both during and after construction in the Jeffries Cove area, and that the toll plaza and other related structures are too close to the residential neighborhoods in East Boston.

On the South Boston side of the harbor, Alternative 3A offers a direct tunnel approach through the Fort Point Channel, curving to meet the easterly tunnel location at Jeffries Cove. This is a very short tunnel, much shorter than the easterly tunnel. It is much longer than other tunnel options, and it has a greater impact on the Fort Point Channel. It also does not provide direct access from the South Boston area, thereby forcing more traffic on to local streets, such as A Street and D Street.

The southerly approach of Alternative 3A is via a toll free tunnel from the Fort Point Channel into South Boston near Summer Street and B Street, approaching the harbor between Piers 5 and 6, and then connecting to the Artery at the North Boston area near Piers 5 and 6, establishing excellent service to the South Boston Industrial Area and reduces traffic flow on South Boston streets.

A modification of Alternative 3A extends the toll free tunnel in South Boston to the Boston Marina Industrial Park and then across the harbor to a port.

on the Bird Island Place. This design provides the ramps near Piers 5 and 6 as described above, and also adds additional ramps in the vicinity of the Boston Marina Industrial Park. The toll plaza is located in the Commonwealth Plate of South Boston instead of in East Boston, and the length of the tunnel under the harbor is about 2500 feet shorter than the easterly tunnel.

The Bird Island Place (BIP) tunnel offers one further modification. This is a two-lane tunnel which terminates at the Airport and does not provide for through traffic connections to Route 1A. This concept is discussed in another section below.

Alternative 6 has no new tunnel. It provides an additional set of ramps to and from the south at the Sumner and Callahan Tunnels. Because of increases in the capacity of the Central Artery and operation of the new Harbor Tunnel, the proposed alternative will use the Wythe-Tobin Bridge, which is underutilized in all the other alternatives.

Neighborhood Tunnel Concerns

One of the consequences of traffic congestion on expressways and arterial streets is that drivers attempt to by-pass the congestions by using local streets. Also, traffic approaching the major street roundabouts in the downtown area is forced to wait in line for a sufficient time to enter the main flow of traffic. In many cases the local streets used are existing arterial or neighborhood collectors, but in some cases the streets are both local and residential in nature.

Efforts to improve local streets to perform satisfactory functions for the abutting users often results in making that route even more attractive to by-pass traffic. It is imperative that traffic flows on the major traffic facilities be improved to a sufficient degree that drivers will not find it advantageous to rely on these facilities in preference to using local streets.

Alternative 1, No Build, does not address this issue. Each of the build alternatives accomplish some degree of relief for local streets in neighborhoods such as Charlestown, North End, Government Center, South End, South Boston and East Boston. In particular, the residential portions of these neighborhoods can derive substantial benefits from the increased capacity of the Central Artery widening and depression and the additional capacity of another cross-harbor tunnel.

The Central Artery North Area Project offers considerable local street relief to Charlestown. Alternative 1A and 1A provide relief to local streets in the North End and Government Center-Downtown areas. Alternative 5A results in substantial reductions of local street usage in South Boston, including diversion of 3000 or more trucks per day from South Boston streets. Alternative 5A includes more benefits to South Boston and does not provide for further benefit street operations in the South End and in East Boston areas.

Central Artery Connections to Regional Highways

Each of the build alternatives includes a pair of new four-lane bridges over the Charles River. The new bridges will be built in the vicinity of the new bridges built to meet the proposed Central Artery North Project, provide substantial operational and capacity improvements at the northerly end of the system.

At the southerly end of the system, opportunities are provided to enhance existing connections to the Turnpike and the Southeast Expressway, including direct access into the South Station Transportation Center. The capacity by increasing the number of lanes and the length of the existing bridge will substantially improve the flows in this vicinity. This improved operation will be further enhanced by the Support Access Alignment of Alternative 5A and 5A Modified.

Support Access Road

Support Access Road describes a proposed facility to directly connect the regional artery system with the downtown area. The proposed road will be located on the South Boston Industrial Area. The limited ability of Northern Avenue, Congress Street, Sumner Street and other South Boston streets to handle the volumes of traffic expected to be generated by this area are major concerns that must be considered with regard to any proposed improvements in this vicinity.

One of the major shortcomings of Alternatives 1, 3A and 6 is that they do not acknowledge that this facility will be a new primary arterial. As a result, many of the traffic volume projections and congestion estimates are understated. These alternatives also do not include design proposals for actually connecting a Support Access Road to the Central Artery or to the Third Tunnel.

Alternative 5A addresses these issues by incorporating a Support Access Road in the basic proposed design of the Third Artery and the proposed Third Tunnel. In addition, Alternative 5A includes the design for further expanding its value to both the South Boston Industrial Area and the South Boston Residential Area by diverting about 2000 trucks per day from local streets such as A Street, D Street and L Street. In addition, it places the proposed new tunnel in a much better location for both construction and operation.

It is important to note that some types of Support Access Road, connected to the remainder of the regional highway system, will not provide the same function if no Third Harbor Tunnel were built. Under these conditions, all the cross-harbor traffic generated by the South Boston Industrial Area would be added to the Central Artery flow and to the overburdened existing tunnels. Whatever advantages might be claimed by the proposed Alternative 6 improvements will

be diminished by this additional load.

Four-Lane Versus Two-Lane Tunnel

A further modification of Alternative 5A proposes a two-lane tunnel concept, which provides direct access to the Airport only, via the Bird Island Flats alignment. The DOTD does not fully analyze the impacts of this proposal, but it is intended to include a more detailed analysis in the final version of the EIS document.

A function evaluation of this matter includes consideration of at least the following factors:

- 1) Under normal operating conditions, the additional capacity of a two-lane tunnel might be able to handle traffic demands up to the year 2010. However, it is anticipated that peak traffic demands during the peak hours are not normal operating conditions. The projected increase of unacceptable congestion from 3 hours per day in 1982 to 14 hours per day in 2010 is reversed to 0 to 1 hour per day with a four-lane tunnel. By 2010, a two-lane tunnel is expected to operate at level of service F, while a four-lane tunnel is expected to be at level of service C.
- 2) The construction schedule for the entire project extends over a period of about twelve years. During much of that time, the existing tunnel entrance and exit areas will be impacted. During some of that time it may be necessary to shut down one or more lanes of the existing tunnels for extended periods of time. The existence of another four-lane tunnel would compensate for this capacity constraint and offer much more flexibility to the operation of the highway system during this disruptive phase. A two-lane tunnel would require the use of a single-lane road to fully compensate for the capacity reductions during construction.
- 3) A two-lane tunnel has many inherent operational and safety problems not faced in a four-lane section. Removal of stalled vehicles results in longer delays for one or both directions. Maintenance activities require shutting down at least one direction of traffic, and in cases both directions. This action in turn poses extremely difficult problems in getting traffic moving again. It is not enough to allow reducing lanes in addition, there is little or no room for evasive driver actions in crisis situations.
- 4) The cost of a two-lane tunnel is not half the cost of a four-lane tunnel. Most costs associated with the tunnel bed will be about the same. The tunnel sections will cost about a third less for the smaller size section, and the approach costs will be somewhat less. The cost of the tunnel structure and the approach costs for the Sumner and Callahan Tunnel approaches as in Alternative 6, which

will add to the cost. The net difference is that the two-lane tunnel is estimated to reduce the total project cost by less than seven percent.

Considering all the factors and implications of the question of a two-lane versus a four-lane tunnel, it appears that the net result weighs in favor of a four-lane tunnel.

Evaluation of Alternatives

Alternative 1 - No Build With Central Artery Dock Replacement

If all the build options are rejected, some programs for improvements to the existing system must be implemented. In addition to repairing the Central Artery, substantial priorities must be given to projects in this vicinity in the alignment of available or replacement funding programs.

Priority projects would include at least the following: South Boston Seaport Access, Boston Harbor Tunnel, Central Artery System, and I-93 projects in East Boston, and TSM projects in the North Station and South Station areas. In balance, the combined benefits of these projects will be insignificant when compared to the benefits derived from any of the build alternatives.

At this time, when compared to the other alternatives under consideration, the No Build Alternative is not acceptable.

Alternative 6 - Central Artery Depression Without Cross-Harbor Tunnel

If a decision is made not to build a new cross-harbor tunnel, then this alternative is a viable one. There is no question that a widened and depressed Central Artery by itself offers enough traffic flow benefits as to warrant support.

Therefore, Alternative 6 is an acceptable option.

Alternative 3A - Central Artery Depression and Cross-Harbor Eastern Tunnel

This alternative offers some advantages, but in almost every instance it comes up short when compared to Alternative 5A. Impacts on the Fort Point Channel are greater than the other alternatives. The adverse impacts on the South Boston area focus on the lack of a direct connection to the expanding South Boston Industrial Area and the fact that there is no direct access to the harbor. On the East Boston side of the harbor, the Jeffries Cove alignment for the tunnel causes unacceptable impacts on that community.

In consideration of these matters, Alternative 3A is not acceptable.

Alternative 5A - Central Artery Depression and Cross-Harbor South Boston Seaport Tunnel

This alternative offers more traffic volume advantages and greater congestion

reductions. The 24% reduction in accidents is impressive. Questions are raised related to Dorchester Avenue, additional traffic benefits to South Boston, and the Jeffries Drive alignment of the tunnel in East Boston. Since these questions are addressed in a more acceptable manner in the Alternative 5A Modification, it is recommended that the proposals in that plan be given preferential consideration.

Alternative 5A is not acceptable unless major modifications are made.

Alternative 5A - Design Modification - Central Artery Depression and Cross-Harbor Tunnel from South Boston to Bird Island Flats

This is the preferred alternative. It satisfies all four of the major improvements desired by the Traffic and Parking Department - increase in the capacity of the Central Artery, satisfaction of demand for additional cross-harbor capacity, improved connections with the Central Artery, and improved connections with the other parts of the regional highway system.

The depression and widening of the Central Artery results in better and more efficient operation of the downtown street system, with disruptions during and after construction held to a minimum. Increasing the number of lanes from four to five results in 40-50% shorter queues and 6.0 million fewer vehicle hours of delay. The depressed Central Artery from Kneeland Street to Causeway Street offers excellent internal circulation patterns.

The Third Harbor Tunnel, running from the Boston Marine Industrial Park to the Bird Island Flats, will provide the additional capacity required to operate all the cross-harbor facilities at an acceptable level of service and will provide the required level of service for the location of the tunnel and its approaches on both sides of the harbor. The proposed location of the tunnel, South Boston and the North End which were not anticipated under previous proposals.

Reduction of traffic flows on local streets will be significant, particularly in some of the residential areas now adversely impacted by increasing congestion on major routes. Traffic capacity increases on the Central Artery will be the result of the proposed improvements. Through traffic so that local residents will be able to enjoy the benefits of the application of traffic management improvements on the local streets.

The Seaport Access Road offers important access opportunities to a major developing area while reducing traffic flow demands on other segments of the system. Replacement of the existing High-Level Bridge at the northerly end and improved connections in the Turnpike-Expressway interchange area will substantially improve the efficiency of the entire regional highway system.

Alternative 5A Modified is the preferred alternative of this department.

6-7-83

Boston

Mr. Frederick Salvucci
Secretary of Transportation
One Ashburton Place, Room 1610
Boston, Massachusetts 02108

Dear Fred:

Since our last meeting concerning the proposal for depressing the Central Artery I have met extensively with my planners and engineers to ascertain the effects on traffic flow conditions in the City from this project. It is the strong consensus here that the proposed project will not only maintain traffic flow but will also provide the benefits of such magnitude as to warrant the complete support of this department. The purpose of this letter is to convey that position.

Perhaps the most significant benefit of the depressed Central Artery proposal is the increase in flow capacity by a third in each direction. Such an increase in throughput capacity for the Central Artery which serves as the hub of a radial highway network, without increasing the size of the highway, is a significant benefit that feeds into the hub will by definition have a measurable benefit on the existing Central Artery congestion problem. This concept is somewhat different than that of the original highway development plan of a decade ago which would have increased the radial capacity of the Boston highway network with no significant increase in the hub distribution network.

Another aspect of the depressed Central Artery proposal that promises to be beneficial is the redesigned relocation of the ramp feeder system that presently constitutes much of the present merge and weave conditions. These existing merge and weave patterns are major contributions to the current congestion and safety problems on the Central Artery.



Kenneth H. White, Mayor/Traffic and Parking Department/Boston City Hall/City Hall Plaza 02211

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In summary, I express my support for the depressed Central Artery proposal because of the significant traffic flow and safety improvements that the plan entails.

Thank you.

Sincerely,

John A. Viaglias
Commissioner

JAV:td

cc: Alex Tate

Boston Redevelopment Authority

Robert J. Ryan, Director

Secretary James Hoyte
Executive Office of Environmental Affairs
600 Cambridge Street
Boston, Massachusetts 02202

Robert J. McDonagh, Chief Engineer
Massachusetts Department of Public Works
100 Nashua Street
Boston, Massachusetts 02114

Dear Secretary Hoyte and Mr. McDonagh:

After careful review of the alternatives proposed for the Third Harbor Tunnel and Central Artery, the Boston Redevelopment Authority supports Alternative SA Modified for further development. Alternative SA Modified offers reasonable solutions to some major transportation problems in the city: inadequate support access for commercial traffic in South Boston and the limited capacity of cross harbor traffic routes and the Central Artery.

However, the BRA supports Alternative SA Modified with some qualifications. A project of its scale in the heart of Boston, is likely to significantly affect adjacent neighborhoods, businesses, and existing development activity in the area. The BRA wants assurance that adverse impacts be minimized and that the proposed project not interfere with current development downtown. Opportunities for improving Boston's core should be maximized during the project's planning and construction and after its completion. To that end, the planning process requires careful definition and the full participation of the City, its citizenry and interest groups. The BRA's first set of concerns is related to the process of planning for the road network and for development related to the proposed project. The BRA's second set of concerns is related to specific components of Alternative SA Modified. A number of environmental, transportation, land use and development, and community issues require further evaluation. The BRA's support for Alternative SA Modified is contingent upon how the process and issues will be addressed.

In respect to project planning, the BRA is concerned, first, with how it will affect the city's development downtown. In the past three years, the BRA has initiated four major projects in the downtown area: the Government Center Garage, and Rose/Foster Wharves--which could be affected by work on the Tunnel and Artery. It is essential that the transportation project not interfere with the orderly development of these projects.

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In addition to projects now slated for construction, the BRA has been planning the development of other parcels close to the transportation corridor. Chief among these is the City's plan for the North Station Urban Renewal Area. Further impacts of Alternative SA Modified on the Urban Renewal Area are assessed (understandably) in detail elsewhere. Here, the point should be taken that project planning needs to respect other plans to develop downtown Boston.

Second, the project will create substantial development opportunities once its construction is finished. The BRA is concerned about the process for developing the land and air rights along the transportation corridor. As the statutory planning and development agency for the City, the BRA should control that process just as it controls growth and change elsewhere downtown.

Third, the BRA's support for Alternative SA Modified is contingent upon careful control of its construction. Today Boston's downtown is a place to live, work, and invest, and it is important to maintain its appeal during the estimated twelve-year construction period. The process of depressing the Artery could seriously disrupt traffic downtown; hurt businesses in the area; and diminish the economic viability, development potential, and quality of life in the center of Boston. Predicting the extent of construction impacts is difficult. Nonetheless, a system for mitigating and responding to them must be developed. The Central Artery and Southwest Corridor projects can and should be clearly defined prior to construction. The BRA's support for the project should address social and economic impacts and should also incorporate a technical component to monitor the environmental impacts of construction and enforce existing controls.

Through a cooperation agreement with the State an outline of which is attached to this letter, the BRA proposes its involvement in project planning and the disposition of property once the project is built. The partnership created by this agreement will facilitate and mitigate the adverse impacts of the sizeable project and to ensure that the transportation goals of the State respect the planning and development goals of the City.

Instituting a cooperation agreement would address the BRA's first set of concerns about the proposed project. In addition, some components of Alternative SA Modified require further evaluation. The BRA is particularly concerned about the long-term visual and environmental impacts of some aspects of Alternative SA Modified.

First, the proposed location of the north-bound artery tunnel within Fort Point Channel would adversely affect the aesthetic and historic qualities of the area, diminish its development potential and its value as a natural water resource. Alignment of Dorchester Avenue within the Channel would intensify these adverse impacts. The BRA suggests that the alternative solutions be found.

Second, the depression of the Central Artery will affect the city's groundwater system. Some buildings in Boston, including the Braintree Branch of the Beacon Hill, have been damaged as a result of projects which lowered the groundwater. The Supplemental DEIS/EIR provides no data on how the project would affect the groundwater levels, movement, or recharge during and after construction. The depressed Central Artery will be a major intrusion into the system, and an extensive engineering analysis needs to be made to evaluate these impacts.

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In addition to the major points emphasized above, the BIA has a number of other comments on Alternative 5A Modified as set forth in the Supplemental EIS/EIR. These comments are grouped under several categories -- Environmental Impacts, Transportation, and Urban Design. The comments are not intended to be all-inclusive nor completely definitive, as only in the further design and engineering work can many issues be properly understood and resolved. The comments primarily address Alternative 5A Modified, which is presumed to be the preferred option, but many have application to the other schemes as well.

ENVIRONMENTAL IMPACTS

Air Quality

- 292 o The impact on air quality from the ventilation buildings should be further evaluated, particularly the combined impact of the proposed North End ventilation building which is in close proximity to the Callahan Tunnel vent building. Consideration should be given to reducing the height of the ventilation building or to relocating it. The air quality (and noise) impact of the ventilation building should also be evaluated. At a height of one hundred feet, the analysis should specifically address whether concentrations at sidewalk and rooftop levels. These NO_2 levels would violate State policy levels and must be reduced.
 - 293 o The mesoscale analysis indicates that all build options would result in higher CO emissions than the no-build option (Table 87). In spite of the fact that vehicle miles of travel for alternatives 3A, 5A, and 5 actually would be reduced (Table 78). This inconsistency should be corrected or clarified.
 - 294 o There is no information given on how NMHC emissions are to be reduced in order for the project to comply with the SIP. Mitigation measures should be specified.
 - 295 o A summary of the air quality impacts of the project should be included in the Table of Summary section.
- #### Noise and Vibration
- 296 o The Supplement does not evaluate the noise impacts of the vent buildings. An analysis of the magnitude of the impact should be included in the Final EIS/EIR.
 - 297 o A three hundred foot long, ten to fifteen foot high noise barrier at the edge of Faneuil Hall Marketplace is totally inappropriate, given the placement of the Collect Center on Parcel D-10. Such a barrier also would restrict the City's future plans to connect the Collect Center and Faneuil Hall Market area to the renovated waterfront.
 - 298 o The criteria for evaluating noise impacts is poorly conceived. The acceptable levels suggested in the report are higher than levels that are generally considered acceptable (Appendix 6). Normally, increases of 5-10 dB are perceived to have a moderate impact (a 10dB increase is

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perceived by most people as a doubling of the loudness of sound) and increases of 10 dB or more normally are considered significant. Therefore, the criterion that a 10-15 dB increase is only "moderate" is questionable. The Supplement should suggest that the project would have only minimal "substantial" impact, whereas the actual noise effects may be considerably more significant.

- 299 o Vibration sensitive industries might be severely affected by construction activities, particularly pile driving. Sensitive receptors, such as the growing photography industry in the Fort Point Channel area, should be identified and mitigation measures developed.

Water Quality

- 300 o Because construction activity will affect water quality (particularly during dredging in the Fort Point Channel), turbidity should be monitored and appropriate mitigation measures, such as the use of silt screens, should be used if excessive levels of suspended solids are generated.
- 301 o Runoff from roadway surfaces is also a major concern because it contains hydrocarbons, petroleum products, and heavy metals. The quality of drainage runoff from the project should be monitored and reduced, while some heavy metals are removed with suspended solids, this may not be adequate to protect water quality in the Harbor.
- 302 o Up to fifty percent of the volume of water in the Fort Point Channel will be displaced by roadway and tunnel construction. This displacement will adversely affect navigational and existing industrial use of the Channel. The Supplement should evaluate the water resources. The BIA supports design modification for the relocated Central Artery and Support Access Road under the seabed of Fort Point Channel.

Historical and Aesthetic Impacts

- 303 o Removal of the elevated Central Artery will improve on the aesthetic character of the corridor. It will reconnect the North End and waterfront to the downtown, and if new development is planned appropriately, this connection could complement the historic character of the surrounding areas.
However, the north-bound Central Artery tunnel and relocated Dorchester Avenue would have significant adverse impacts on the aesthetic character of the corridor.
Reduction of water surface, changes in bridge symmetry and the visual presence of a roadway over the Channel are all significant negative impacts that need to be minimized. As noted below, the need for the roadway construction in the Channel is questionable.

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Ramps, and especially ventilation buildings, will have significant and adverse impacts. As proposed, the vents will be one hundred feet high and sixty feet square, which is out of scale with the surrounding areas. Alternative treatment of vent buildings that would incorporate them into new development and make them unobtrusive must be developed.

o Adverse impacts will result at Paul Revere Landing, at the North Washington Street Bridge in Charlestown, and at the MDC park on the Boston side, where the bridges over the parks will be very large and low to the ground, creating a negative visual effect.

Mitigation Measures

Development of mitigation measures must be an integral part of the Final EIR/EIS. Although noted throughout the report, the measures identified often are very sketchy or generalized. Mitigation measures must be specific and their implementation must be guaranteed as part of the project. Many of the design modifications suggested are Option 2 and therefore are not eligible for funding under this program.

TRANSPORTATION

Alternative 5A Modified achieves the broad objectives of reducing congestion and improving traffic flow at critical locations, of causing a net reduction of traffic volume on the major arterial, and of serving present and future development on the arterial. The BTRA believes its construction would not diminish patronage on a well-operated transit system. If built, the project would ultimately improve transportation. But the BTRA has some concerns about disruptions to vehicular and pedestrian traffic during the long construction period and about traffic problems that might occur at specific locations, as noted below.

o The proposed reconstruction of the Central Artery, while increasing the mainline capacity, would relocate and eliminate the mainline access ramps and create a continuous surface artery from Kneeland Street to Causeway Street, and from the North Washington Street bridge to Charlestown. This proposal is likely to increase traffic on local streets, resulting in congestion, interruption of pedestrian links, and possible degradation of development sites. Overloaded ramps could also reflect into mainline operations, defeating the costly widening measures.

During the design phase, the scale of the new surface street system should be controlled so that the same traffic loads must be efficiently handled. The dimensions and local conditions of the area should be refined and appropriate land use planning undertaken. The area around Government Center, Faneuil Hall Marketplace, and the North End are critical. For example, refinements to the New Sudbury/Cross Street intersection and related connections will be necessary to mitigate traffic impacts.

- o Traffic access should meet the needs of both existing and planned development. The extension of High Street across the depressed Artery could be aligned with the entranceway to the proposed Rows wharf development. In South Boston, the ramps from the Third Harbor Crossing/Seaport

Access link which lead to Northern Avenue must be carefully designed to relate to Boston Wharf Properties, Cabot, Cabot & Forbes development, piers 1, 2, 3, and 4, and other parcels and to associated local access roadways. Other examples exist throughout the corridor, including North Station, which is dealt with separately below.

o The location of ramps and roadways in the North Station area would seriously damage access plans of the North Station Urban Renewal project. Direct access to and from the south is eliminated and the feasibility of the loop access roadway is threatened, along with truck servicing plans. An early and serious effort must be made to coordinate the transportation planning with the City's plans for the area.

The street pattern formed by Causeway Street and Merrimac Street/Lomaney Way is common to all schemes and the reconstruction and improvements to these streets, as proposed in the Urban Renewal project is complementary to Central Artery plans. State support in achieving this reconstruction in the near future would be mutually beneficial.

The proposed Artery reconstruction would relocate the northbound lanes of the Dewey Square Tunnel into the Fort Point Channel, with negative impacts on the Channel and on adjacent development. Alternative 5A may provide enough traffic diversion through the combined Third Harbor crossing and Harbor Access link to eliminate the need for new capacity on the Channel. The Harbor Access link would be closed to 2010 average daily traffic in the Dewey Square Tunnel section for Alternative 5A (100,500, while for Alternative 6, without a new harbor crossing, it is 185,900 vehicles). The potential for minimizing costs and disruption because of this should be seriously considered. This possibility might be a four-lane harbor crossing connected to Route 1 in East Boston.

0 The Artery reconstruction should provide for an improved and extended Herald Street as a by-pass to the South End and cross-town link to the Back Bay. Ramp configuration should focus on Herald Street rather than on East Berkeley Street, in order to help reduce traffic through the residential streets of the South End.

o Alternative 5A Modified would minimize the amount of through traffic on residential streets, particularly in South and East Boston. The location of the Third Harbor Crossing on Airport property would remove traffic destined for the Airport and North Shore from East Boston streets. Integrating the Seaport Access route into the Third Harbor Tunnel approach would remove commercial traffic from local streets in South Boston. The BIA strongly supports these aspects of the Alternative.

The design and construction of Avenue de Lafayette and related Dewey Square area roadways should be facilitated in advance of the Tunnel/Artery project. This portion of the transportation network would relieve congestion and mitigate some of the adverse effects imposed on businesses resulting from Central Artery construction.

①

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- o Traffic access should meet the needs of both existing and planned development. The extension of High Street across the depressed Artery could be aligned with the entranceway to the proposed Rows wharf development. In South Boston, the ramps from the Third Harbor Crossing/Seaport

- o Bus ramps to and from the expressway/turbine/tunnel complex should be incorporated into the South Station Transportation Center. The ramps could form the core of a program which would give priority to buses for the more efficient movement of people.

LAND USE AND DEVELOPMENT

South Boston - Fort Point Channel

- o The transportation and economic impacts of construction on this area would be severe. Access to the airport and the transportation network could be severely disrupted. Construction could cause the loss of sensitive industries to go out of business or relocate out of the Fort Point Channel area. The printing, food processing and restaurant industries, which comprise a large percentage of the area's business, would be directly affected.
- o Construction would restrict pedestrian access to the various parts of the Fort Point Channel area, particularly around the Congress Street off-ramp construction area. A temporary pedestrian bridge should be built to maintain access to the area. Signs should be placed to indicate the possibility of increased truck traffic on residential streets, as drivers seek to avoid construction areas.

South Station

- o Guidelines for the South Station air rights development will be issued in the Spring of 1985, and the project is scheduled for completion in 1987. Construction of the new transportation system and surrounding development could seriously affect the BPA's ability to attract a tenant to this site. Construction in this area could also adversely affect the success of the hotel and office air rights development.
- o In the long term, the project is likely to enhance the potential for the development of hotels, offices, and high technology industries interested in convenient access to Logan Airport and the metropolitan transportation network.

Central Business District

- o The BRA is concerned about the impact of the twelve-year construction schedule on retail sales, especially since some of the estimated five percent loss of sales could become permanent as shoppers establish new habits. Although the DEIS/EIR estimate is based on loss of auto-dependent customers, additional losses could result from other economic impacts of construction. Construction could disrupt activities in the Downtown Crossing area, especially those involving the use of taxis and other vehicles. To mitigate this disruption, alternative transportation methods, such as subway, commuterail, and ferry transit should be increased.

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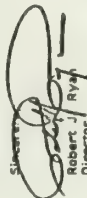
Waterfront and North End

- o Construction could obstruct vehicular and pedestrian access to the Waterfront and North End, diminishing their attractiveness and economic potential. Parking facilities should be provided to encourage transit use and mitigate the impacts on the small retail businesses and restaurants in the area, and on residents and tourists. An appropriate parking supply should be maintained during construction and included in long range plans.

North Station

- o The BRA is concerned about the impacts of Alternative 5A Modified on the Port Station Urban Renewal Project Area. The plan for depressing the area would require the construction of a new bridge over the Storrow Drive connection, but would not require the construction of a new bridge over the Storrow Drive connection. The plan would add tunnels and ramps at the edge of the Charles River and would occupy an excessive amount of land suitable for other uses. Other alternatives should be explored, including the DPW's Alternative Alignment #1 and the solution proposed in the North Station Urban Renewal Plan.
- o Depressing the Central Artery affords the opportunity to modify the area's appearance and support the City's plans to redevelop the North Station. The area is close to both the harbor and the Charles River. The area has many resources which enhance its development potential. However, Alternative 5A Modified ignores the prospect of connecting this Urban Renewal area with the Waterfront and Esplanade, as a result of the proposed Charles River bridges and the Storrow Drive connector. Although the existing bridge passes through this space, it is less intrusive than the proposed bridges because it is high off the water and so close to the dam that it becomes part of the eastern boundary of this water space. The proposed bridges would destroy the attractiveness of the adjacent land. The opportunity for restoring the attractiveness of the area while simultaneously improving the North Station area should not be lost.

The BRA looks forward to participating in the on-going work on this challenging project. Through a cooperative planning and development process, it will be possible to resolve the concerns noted in this letter and to generate a project which both improves transportation and enhances the environment of the city.


Robert J. Ryan
Director

cc: Mr. James A. Walsh
Division Administrator
Federal Highway Administration

Mr. Frederick Salvucci
Secretary, Executive Office of
Transportation and Construction

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OUTLINE OF PROPOSED COOPERATION AGREEMENT BY AND BETWEEN THE STATE OF MASSACHUSETTS AND THE BOSTON REDEVELOPMENT AUTHORITY FOR THE CENTRAL ARTERY DEPRESSION PROJECT

I. NEED AND PURPOSE

A Cooperation Agreement is proposed, based on the expectation that the State will plan and construct a third harbor tunnel and reconstruct the Central Artery. The project will have a major impact on Boston, particularly on the districts and neighborhoods adjacent to the transportation corridor. Its impact will be felt both during construction and in the subsequent development of parcels created by the project. To minimize the adverse impacts and to maximize the potential benefits of the project to the City, the State and the City should enter into a Cooperation Agreement for the development of the Central Artery and the surrounding area. The BMA has a legitimate role in the progress of the project, but the scope of work required exceeds the local resources available to the Authority to properly exercise this role. The Cooperation Agreement defines the functions and responsibilities of the State, BMA, and citizen advisory committees. The exercise of the respective functions and responsibilities should be funded by the State as an integral part of the project costs.

II. OUTLINE OF THE MAJOR ELEMENTS OF THE AGREEMENT

- The BMA would receive on-going financial support from the State to participate in planning the transportation project, to advise the State as the legitimate advocate of local interests, and to guide the planning and development of parcels created by the project. Financial support would extend for the duration of the project.
- The BMA would organize citizen advisory committees at both the district and project-wide levels and provide each with staff and consultant support.
- Retained as a consultant, the BMA would make quarterly reports on its activities to the State. The activities would include two major elements:
 1. Community goals, land use and urban design guidelines and a public improvement plan for areas adjacent to the corridor during and following reconstruction of the Artery. A plan and procedures for property disposition will be included.
 2. Development guidelines, an outline of the developer selection process and leasing guidelines for the air rights development parcels resulting from the Central Artery Depression.

- The State will not take land from the City without agreeing to develop the land in a way which will benefit the City and the development district which is adjacent to the project. The State will guide the air rights development by establishing guidelines, selecting developers, and administering leases.
- The State would hold the City harmless from loss of property taxes due to takings by making payments in lieu of taxes.
- The BMA will coordinate the work of all City of Boston departments during planning and construction of the project.
- The State will fund all local improvements, relocations, realignments, reconstructions necessary to make the road network compatible with areas contiguous to the highway.

RESPONSE TO COMMENTS BY THE BOSTON REDEVELOPMENT AUTHORITY (August 22, 1983)

287. The FEIS/PEIR acknowledges the fact that the BRA has selected a developer for Parcel 7, and that this project may have an effect on the design and schedule for implementation of the proposed development. Continued coordination and refinements to the Preferred Alternative's design will be necessary during the later phases of this project to mitigate these impacts. Likewise, impacts to the timing and type of development which occur at the Government Center Garage may be affected. Parcel D-10 and Rows/Fosters Wharf will not be directly affected by the project, although construction period impacts will be felt.

288. The need to establish a continuing joint development planning and design process was emphasized by a variety of public and agency commenters, and the Commonwealth recognizes the paramount importance of this issue. Section 4.4.4 Joint Development, outlines in detail how the State proposes to establish an ongoing open participatory process to carry out sensitive and environmentally-sound air rights development. As you note, the significance of the project for Boston's development program requires that the City of Boston, including the BRA and various city departments, play a major role in the process. See also response to comments by the City of Boston, Office of the Mayor. Close coordination will be maintained by MDPW and SOTC with the City to determine the best mechanisms for proceeding with cooperative planning of both the joint development process and mitigation measures dealing with construction impacts.

289. Construction-period impacts and mitigating measures are identified throughout Chapter 4.0. As the project enters the design phase, additional details regarding mitigation will be solicited from the BRA and others, and further construction impact documentation will be prepared. Specific measures will be included in the construction plans and contract specifications.

290. Further refinement of the northbound Central Artery tunnel and relocated Dorchester Avenue is incorporated into the Preferred Alternative. Specifically, the tunnel profile has been lowered and realigned in the vicinity of Congress Street to reduce encroachment in the Channel. Also, relocated Dorchester Avenue has been narrowed to two-lanes, one-way northbound, and has been removed from between Summer and Congress Streets. These and other measures have been developed and incorporated to reduce impacts in the Channel. A discussion of alternatives evaluated to avoid the Fort Point Channel is included in Chapter 5.0 SECTION 4(E) EVALUATION.

291. Effects of construction on groundwater levels have been considered in development of all build alternatives, including the Preferred Alternative. Use of slurry walls and other lateral support systems are included in the design to control drawdown of the groundwater table. Because of the proximity to tidal waters, special measures to monitor groundwater levels during construction will be included, such as use of observation wells, piezometers, or other methods. Provisions will be made during design to allow the flow of groundwater across the excavation, in order to prevent development of elevated water levels on one side of the excavation. Specific actions will be included which will limit the effects on groundwater and adjacent structures. These actions will require an extensive engineering analysis to be undertaken during the design of the project.

292. These considerations are addressed in Section 4.7.5 Effects of Ventilation Building Emissions: the effectiveness of these measures to comply with DEQ requirements will be evaluated during design. In the future, the

ventilation building that is proposed to be constructed at the intersection of North and Cross Streets may actually be located elsewhere, depending on the results of further air quality analyses.

293. The vehicle miles of travel for the build alternative were based on travel in an area totally within Route 128 and reflect diversions of traffic from longer, more circuitous routes to the improved, more direct highway system. The mesoscale analysis was based on a much narrower, project-specific corridor, which included increased traffic volumes on the network. The air quality impact analysis test in the FEIS/PEIR (Section 4.7) has been revised to clarify this discrepancy.

294. See response to comment number 201 by DEQ.

295. See SUMMARY.

296. Noise impacts from ventilation buildings are insignificant, so long as acoustic treatment is included in the design to conform to City of Boston Noise Ordinances and guidelines of DEQ. (See Section 4.8.1).

297. This barrier was acoustically feasible, but has been rejected specifically for the reasons cited in the BRA comment.

298. Regardless of the subjective noise descriptor terminology, noise abatement has been considered wherever the resulting noise levels would exceed FHWA criteria for the particular category of land use.

299. Vibration impacts to receptors in the Fort Point Channel area are described in Section 4.8.2 Vibration. Receptors closer to the construction site than the growing photography industry mentioned, such as the Gillette Company and the South Postal Annex, will experience perceptible vibrations during construction although business operations are unlikely to be affected. Special techniques to minimize these vibrations will be included in the construction documents, including use of low displacement piles, pre-augering for piles, slurry wall construction, etc.

300. See response to comment number 267.

301. See response to comment number 266.

302. The Preferred Alternative minimizes water displacement (approximately reduction of tidal prism by 21 percent) and subsequent effects on water quality and navigation. The design of the Preferred Alternative has minimized filling to the greatest extent possible, specifically by placing the Third Harbor Tunnel box below the Channel bed and by allowing water to pass beneath the deck on which part of Dorchester Avenue will sit. Further reduction in displacement was not possible. Impacts to industrial water users of the Fort Point Channel are discussed in Section 4.9 WATER RESOURCES; navigational impacts are discussed in several places in the FEIS/PEIR, including description of construction (4.1), land use (4.4), and water resources (4.9).

303. Refinements to the design have addressed these aesthetic concerns, and a Memorandum of Agreement has been signed by the Boston Landmarks Commission, Massachusetts Historical Commission, MDPW, and FHWA on the impacts and

mitigation measures to the Fort Point Channel and other affected historic resources. See COMMENTS AND COORDINATION and Section 4.16 AESTHETIC IMPACTS.

304. Opportunities to incorporate the proposed facilities with new development are discussed in Section 4.4.4 Joint Development. Details of the appropriate measures will be developed further during the design phase, consistent with the Memorandum of Agreement (MOA) concerning Section 106. Consistent with the Section 106 MOA, surface treatment and/or determination of final location of the ventilation structures to minimize visual impacts on neighboring parcels will be taken into consideration (see 4.16 AESTHETIC IMPACTS).

305. See Section 5.1.4 Paul Revere Landing Park for discussions of impacts to the Paul Revere Landing Park. Also refer to the Memorandum of Agreement in COMMENTS AND COORDINATION. As a measure to mitigate Section 4(f) impacts on Paul Revere Landing Park, EOTC and MDPW will continue to work closely with MDC to facilitate land acquisition on the Charlestown side of the River; preservation of access to recreational values of the Charles River Basin will be a major objective in development of a single plan for the area, and suitable remnants of parcels acquired for right-of-way for the Central Artery Depression Project and the related North Area Project will be made available for park use (see Section 5.1.3 Charles River Basin Preservation). Continuing efforts will be made to improve the appearance and reduce the impacts of the bridges across the Charles River.

306. Mitigation measures are identified throughout the FEIS/FEIR, and will be implemented in the design. Those mitigating measures described in the FEIS/FEIR will be carried out either by FHWA or by the Commonwealth.

307. Certain refinements to the street patterns in the project corridor are presented in the Preferred Alternative. Since the publication of the SDER/SDER, the Preferred Alternative has been modified to include additional ramps not included in the initial designs. Traffic analysis in Section 4.2 shows a net decrease in traffic on certain local streets. It is recognized that certain areas will require further design refinements to improve operating conditions on the local streets, including the roadways in the Government Center, Faneuil Hall, and North End areas. During design, refinement of these designs will continue with coordination from the City.

308. See response to comment number 307.

309. Coordination has continued during the FEIS to address consistency of the project with BRA plans for the area. Design coordination in the Fort Point Channel and South Boston areas will continue to ensure that development of these areas is well served by the project.

310. Project design will be coordinated with future plans for the North Station area during preliminary design (see Section 4.4 LAND USE IMPACTS of the FEIS/FEIR).

311. The concept of not increasing Dewey Square tunnel capacity while widening the Central Artery has been presented in Section 2.3.4 Other Concerns. Examined in the FEIS, it was rejected because it did not provide adequate traffic service.

312. The Preferred Alternative includes this new roadway, as suggested by the BRA and South End community comments.

313. The South Station Transportation Center is assumed to be constructed prior to the Central Artery construction; certain elements of the

transportation improvements, however, have been incorporated into this project (related to tunnel access), as identified in Section 2.2 PREFERRED ALTERNATIVE.

314. Bus ramps to and from the Southeast Expressway/Central Artery/Massachusetts Turnpike/Third Harbor Tunnel and the South Station Transportation Center are included in the Preferred Alternative, as suggested in this comment.

315. Construction duration in the Fort Point Channel and South Boston areas is significantly less than 12 years; see Section 4.1.2 Construction Sequencing. Additionally, traffic access to the Airport will be maintained during construction. Impacts on businesses are described in Section 4.6 ECONOMIC IMPACTS.

The State will consider the provision of special incentives to businesses to help them and to ensure that they relocate in the immediate area; these options will be explored fully in the design phase. Additionally, the Commonwealth recognizes that businesses may be indirectly affected by the project and may need assistance to stay in operation. The Commonwealth will explore these strategies fully in the design phase (see Section 4.3.3 Related Business Economic Impacts).

316. Access across Fort Point Channel will remain open during construction, for both pedestrians and vehicles. Maintenance of all bridges will reduce traffic diversions to South Boston Streets. Detour routes will not be developed until the design phase of the project. Concerns of increasing truck traffic in residential streets will be addressed in detail by those detour plans.

317. Coordination of plans and construction schedules will occur during the design phase to minimize effects on development.

318. There will be no project construction in the Downtown Crossing area. All six lanes of the existing Central Artery will remain open to traffic throughout the construction period. Local streets will be maintained or relocated with minimal loss of operating capacity. Increased mass transit service will be pursued by the Commonwealth with the appropriate transit operators. The Corridor Planning Study identified several mass transit options which could supplement the highway service in the area; low cost improvements will be considered.

319. Measures to maintain continued pedestrian access and replace lost parking are addressed in Sections 4.2.10 Parking Impacts and 4.4 LAND USE. The Commonwealth will explore other innovative assistance measures for affected businesses.

320. Impacts of the Preferred Alternatives on the North Station area are discussed in Section 4.4.J in LAND USE IMPACTS. All parking spaces in the North Station/North End area will be replaced both during and after construction. Consultation with the community about necessary mitigating measures will occur throughout the design process. The Commonwealth will explore marketing assistance to maintain local business activities during construction. Parking impacts are discussed throughout Section 4.4 LAND USE and are reviewed in Section 4.2.10 Parking Impacts. The impact analysis recognizes conflicts of the alternative with the BRA's Urban Renewal Plan, and, as discussed in previous responses, will require continued coordination during project development with the BRA and MDC to mutually resolve these conflicts. The MDPW Alternative #1 Leverett Circle Connector solution proposed in the BRA's North Station Urban Renewal

Plan has been rejected because of opposition from area residents (West End and Back Bay), and also because of the potentially more significant environmental impacts which could result (as compared to the Preferred Alternative); See Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE.

321. As discussed above, extensive coordination will continue during the design phase to resolve issues related to the roadway design and the BBA's plans for the area. Combined with inputs from the MDC, it is likely that the Preferred Alternative will not preclude connecting the Esplanade with the Waterfront area. Although the proposed lower-level bridges may psychologically affect this connection, they will not physically affect the connection and continued efforts will be made to improve their appearance. Greater concerns in this regard lie with the pedestrian's crossing of the MBTA commuter rail tracks. These concerns, however, will be discussed further during the design phase.



CITY OF BOSTON CONSERVATION COMMISSION / 725 - 4416 / CITY HALL / BOSTON, MASSACHUSETTS / 02201



Robert T. Tierney, Commissioner
Department of Public Work
Commonwealth of Massachusetts
100 Nashua Street
Boston, MA 02114

August 22, 1983

Dear Commissioner Tierney:

Thank you for the opportunity to comment on the Supplement to the Draft Environmental Impact Statement/Report on the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93 project. The Commission views the depression of the Central Artery and the Third Harbor Tunnel as interlocking solutions to the problems of vehicle movement in the City and would reject the projects if not constructed jointly.

After a lengthy review of this major and complicated project, the Commission feels that Alternative 3A-Modified is the least offensive to the people and environment of the City of Boston. This alternative seems to serve the regional vehicle transportation problems by improving connections with other parts of the metropolitan roadway system, meets the projected demand for additional cross harbor capacity and increases the number of lanes in the bottleneck area of the Central Artery. This option also offers the greatest potential for restoring the adverse impacts on communities adjacent to the project area, while offering a viable alternative to the existing I-93/Central Artery. This roadway removes the fear of traffic diversions thru residential communities and offers an important access opportunity to a major development area between the Fort Point Channel and the Reserve Channel areas of South Boston.

The 3A Modified Alternative improves daily basis thru meaningful dialogue between the affected groups concerned about the Fort Point Channel. The Boston Conservation Commission, the Boston Harbor Landmarks Commission, the Boston Landmarks Commission, Boston Preservation Alliance, The Fort Point Channel Artists Group, and The Gillette Company. The Commission sees the need for this process to continue thru the planning and design stages with specific committees for each of the areas disrupted. This committee process would be formal and structured with emphasis on how the construction and design of this project fits into the adjacent community specifically as it relates to:

- aesthetics
- surface roadways
- ramps
- guidelines for development parcels
- surface transportation facilities
- pedestrian traffic

Robert T. Tierney, Commissioner
August 22, 1983

The following are a few of the issues which need more attention and should be dealt with at this committee level over the next few years:

- The City of Boston is deficient in Open Space Land according to Federal Standards. No decrease of wetland or waterways will be tolerated. This project offers a unique opportunity to add much needed people oriented open space to the City scape. 322
- Any additional tunnel in the Harbor should allow for future depths in the main ship channel of 53'. 323
- Any vent structures which must be located on or near the waterfront shv be designed as coastal or waterfront structures with public access and/or shoreline dockage provided for the public. 324
- The project offers a unique opportunity to correct a major source of pollution to Boston Harbor, the area of the Fort Point Channel above the Harbor Tunnel. This area is currently used by the Harbor Tunnel to the impact statement. Extending the Harbor Canal Conduit to discharge in front of the Gillette development area and the Fort Office is unacceptable. The Federal Highway Administration and the Massachusetts Department of Public Works can lead the way for water quality improvements to Boston Harbor by coordinating the funding of this project with the HOC Combined Sever Overflow project for the Fort Point Channel. 325
- Reconsider the need for a new fixed span Northern Avenue Bridge given the current project being funded. 326
- Develop a procedure for notifying all abutters of construction schedules, special efforts to address traffic management and pedestrian access during construction. 327
- The potential value of the Fort Point Channel is immeasurable to development in this area of the City. The old alignment of Dorchester Avenue should be investigated for total vehicle passage before any new Dorchester Avenue is proposed in the channel area. 328

The Commission looks forward to continued involvement with the State over the next few years on improving this project for the City of Boston.

Sincerely,

Lorraine M. Downey

Lorraine M. Downey
Executive Secretary
Boston Conservation Commission

cc: Secretary Burke
Secretary Salvucci

LMD/edf

RESPONSE TO COMMENTS BY THE CITY OF BOSTON CONSERVATION COMMISSION
(August 22, 1983)

322. There will be a net increase in park lands in the City of Boston as a result of increasing the size of the East Boston Memorial Stadium as presented in 5.1.1 East Boston Memorial Stadium. Portions of the air rights land above the depressed Central Artery will be developed as public open space.

323. See comment number 35 by the US Army Corps of Engineers and the response to that comment regarding future main shipping channel depths in Boston Harbor.

324. A planning process will be set in place during the design phase to solicit further input on ventilation buildings relating to issues of landscaping, building configuration, architectural treatment, siting, and location. These issues are discussed throughout Sections 4.4.4 Joint Development, Section 4.16 AESTHETIC IMPACTS, and Chapter 5 SECTION 4(f) EVALUATION.

325. The effect on water quality and on the Gillette Company are documented in Section 4.9 WATER RESOURCES (see response to comments by the Gillette Company [Nos. 429 through 652]). The Commonwealth is working with the appropriate regulatory and funding agencies to increase the priority of this project.

326. The Northern Avenue Bridge Replacement is a separate project. The bridge design is currently being given further consideration by the Commonwealth in response to issues raised by citizens in this and other processes.

327. Specific procedures will be developed to keep all abutters fully informed about construction activities and schedules, including all access issues.

328. Use of existing Dorchester Avenue has been investigated further; relocated Dorchester Avenue has been redesigned to minimize encroachment into the Fort Point Channel (see Section 5.2.3 Fort Point Channel District).

R.T. Tierney
BPM
Comm of Mass
8/22/83

page 3

5. Mitigation of the negative impacts by positive actions aimed at improving the environment of the channel. Such measures might include facilities to improve water quality in the channel and redesign of the Northern Avenue bridge to allow full access by pleasure crafts and working boats.

6. A process for continued review of more detailed plans for the treatment of the channel, its bridges and bulkheads.

With respect to impacts on resources other than the Fort Point Channel the Commission would like to see: (Alternatives 1a, 1a, 4 & 6)

1. A process for anticipating and monitoring construction impacts on historic resources adjacent to the Central Artery, and a plan for monitoring and mitigating such properties in the event of anticipated or unanticipated damage.

2. A process for continued review of the location and design of vent buildings, new highway ramps and new surface streets adjacent to historic properties and other development on parcels to be created. This can be handled through the Advisory Council procedures established pursuant to Section 106 of the Historic Preservation Act of 1966.

While the draft EIS/EIR does not adequately evaluate the effects of the project on archaeological resources, it is the understanding of this office that a field investigation of the preferred alternative will be undertaken this fall and that the Advisory Council procedures for protection of historic and cultural properties will be followed.

We look forward to continued discussions with the Executive Office of Transportation concerning this project and measures to reduce its negative impacts on the city's historic resources.

Sincerely,

Marion Thyne

Marion Thyne
Executive Director
Boston Landmarks Commission

cc: Secretary James S. Boyce
Exec. Office of Environmental Affairs
100 Main Street
Boston, MA 02102

RESPONSE TO COMMENTS BY THE BOSTON LANDMARKS COMMISSION (August 22, 1983)

129. There has been extensive coordination with the Boston Landmarks Commission subsequent to the SPEIS/SPDIR. Their concerns have been addressed as part of this coordination, and are reflected in the Preliminary Case Report and the Memorandum of Agreement (see COMMENTS AND COORDINATION) for further discussion on effects to Fort Point Channel, see Section 5.2.3 Fort Point Channel District, which includes the resolutions reached via the Preliminary Case Report and the Memorandum of Agreement.

Preliminary and final design and construction specifications will be submitted to the Massachusetts SRPO, prior to start of construction, for review and approval in consultation with the Boston Landmarks Commission (BLC) regarding consistency with the design development guidelines outlined in Chapter 5.0 SECTION 4(f) EVALUATION.

Boston Water and
Sewer Commission

10 Bowdoin Street
Boston, Massachusetts 02109
817-424-5044

City Engineer
RECEIVED
AUG 19 1983

August 19, 1983

Robert T. Tiernsey, Commissioner
Department of Public Works
100 Nashua Street
Boston, Massachusetts 02114

Attention: Central Artery Section

Re: Third Harbor Tunnel/Central Artery
Supplement to Draft EIS/EIR

Dear Commissioner Tiernsey:

The Boston Water and Sewer Commission has reviewed the several supplemental reports submitted as part of the Draft Environmental Impact Statement/Report on the Third Harbor Tunnel/Central Artery.

The reports evaluate four additional alternatives, three of which include the depression and widening of the Central Artery.

We would like to comment on two aspects of these alternatives, namely impacts on Commission water and sewer facilities and effects on the Third Harbor Tunnel/Central Artery. The latter should be read in conjunction with our comments on the Third Harbor Tunnel Draft EIS/EIR of April 6, 1983.

1. Relocation of BWSF Facilities

A depressed and widened Central Artery will have a major impact on Commission water mains, sewers and storm drains necessitating relocation of these facilities. The existing wastewater and storm drainage systems will have to be completely redesigned and constructed in order to accommodate the proposed Central Artery improvements. The Supportive Engineering Report does not give adequate consideration to the hydraulic factors, required capacities or feasible alignments for the relocated facilities. It is not acceptable to the Commission to use pumps or siphons to overcome hydraulic problems, because the former are costly to operate and the latter are difficult to maintain.

Re: Robert T. Tiernsey
August 19, 1983
Page Two

Although it is stated that existing utilities will remain in operation during relocation, the reports do not distinguish clearly between those utilities which will be relocated and those which will remain in place. The sequence of the relocation of Commission facilities presented in the construction schedule.

In the event that a depressed and widened Central Artery alternative is selected, we expect to work closely with the project engineering consultants on the redesign of the Commission's water and sewer systems. In addition, Commission approval of the design of the Central Artery project and the Commission's interceptor project, now under construction, and a future combined interceptor in the same general vicinity will be necessary.

The extension of the Roxbury Canal Conduit, which is proposed under all build alternatives, will be subject to Commission standards, criteria and approval. Coordination between the Third Harbor Tunnel/Central Artery project and the Commission's interceptor project, now under construction, and a future combined interceptor in the same general vicinity will be necessary.

2. Water Quality in Port Point Channel

The Water Resources Supplement does not adequately address the effects on water quality in Port Point Channel which will result from the three build alternatives. These alternatives include addition of the Central Artery, the Third Harbor Tunnel, and the widening of the Central Artery. The widening of the Central Artery will increase the tidal prism and the tidal prism will increase the concentration of pollutants (discharged by the Roxbury Canal Conduit), reduce the dilution of existing discharges, and increase solids depositions on the bottom. The impacts of the tunnel alternatives on Port Point Channel should be quantified in terms of water quality parameters and evaluated in terms of water quality standards.

Thank you for the opportunity to comment on the Third Harbor Tunnel/Central Artery Draft EIS/EIR.

Yours truly,

Charles R. Butler
Charles R. Butler, P.E.
Chief Engineer

CH/TS/LS/MSW

CC: J. E. Boyce, EDC

J. A. Walsh, FWA

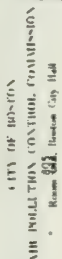
A. J. McDonough, BOW

R. Kelly, S-S-M-W, C.E. McGuire

RESPONSE TO COMMENTS BY THE BOSTON WATER AND SEWER COMMISSION (August 19, 1983)

330. The BWS/TSR recognizes major impacts to utilities, including those of the Boston Water and Sewer Commission (see Section 4.15 UTILITIES). Coordination efforts during the design phase will occur.

331. Water quality impacts on the Port Point Channel are not expected to be significant. They are specifically addressed in Sections 4.9.3 Preferred Alternative and 4.9.4 Construction Impacts of the Preferred Alternative.



CITY OF HUDSON

AIR POLLUTION CONTROL COMMISSION

REPORT ON THE AIR QUALITY MONITORING PROGRAM FOR 1987

August 22, 1993

Mr. James S. Hoyce
Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02102

ATTENTION: NEPA UNIT

RE: THIRD HARBOR TUNNEL, INTERSTATE 90/CENTRAL ARTERY, INTERSTATE 90/30TH
MASSACHUSETTS, CORA NO. 4325, SUPPLEMENT TO THE DRAFT ENVIRONMENTAL
IMPACT STATEMENT/REPORT (SDRIS)

Dear Secretary Hoyce:

In accordance with the Massachusetts Environmental Policy Act, Chapter 30, Section 62, MGL, the City of Boston Air Pollution Control Commission (BAPCC) hereby submits its comments on the aforementioned.

The City of Boston Air Pollution Control Commission has reviewed the various alternatives, including the "No build with Central Artery Deck Replacement", and hereby supports and prefers the "Alternative SA Design Modification" in its entirety. This alternative includes the widening and depression of the Central Artery and a third harbor crossing alignment from Commonwealth Place in South Boston to the third harbor lane within Logan Airport, East Boston.

The following will first address the Central Artery, then the Harbor Crossing, and finally the design issues and construction impacts that must still be discussed and resolved in the final EIS. It should be noted that the NARC's letter to the NARC's Executive Committee was included in the City of Boston's letter to the NARC's Executive Committee and more specifically on the Central Harbor Tunnel/Central Artery Task Force.

The most important aspect of the SDERS is the decongestion and widening of the Central Artery. Briefly, the existing and future congestion on the Central Artery is caused by the lack of a street network and the localized air and noise pollution problems. If the non-build alternative was selected, the City of Boston would continue to have a major arterial street, but it would not be able to handle the traffic volume that would be generated by an increased number of cars. The proposed widening will have the advantage of providing a more efficient street network, which will improve the City's ability to handle future traffic demands. The widening will also provide a more efficient street network and provide for a general air quality improvement by reducing existing CO₂ hot spots within the City by decreased idling and more efficient traffic flow. The widening will also improve the level of service at the major roadway intersections.

depression of the Central Artery will improve the aesthetics, land use potential, localized air and noise pollution impacts and revitalize the potential economic growth. The existing elevated Central Artery must undergo substantial deck reconstruction that would be extremely disruptive to traffic flows over the three year period and provide no benefits when completed.

Secretary Hoyce
August 22, 1983
pg. 2

Therefore, the BAPCC strongly supports the depression and widening of the Central Artery as essential to the stability and vitality of life within the City of Boston and throughout the region.

The third harbor crossing alternatives are presented in four different scenarios. To be brief, the design modifications within the JA alternative provides the least negative impacts while providing the most beneficial impacts on the South Boston and East Boston neighborhoods.

The DEIS/EA and the SDIS/EA in-depth technical data clearly reveals a need in the future for a third harbor crossing and the BAPCC is of the opinion to concur with that assumption. The third harbor crossing will divert traffic from its final destination is Logan Airport from the Central Artery, Calihan Avenue and the Airport Expressway. The last two major aspects of air traffic at Logan Airport, however, are both expected to increase. The existing traffic at Logan Airport shows an increase above the average overall increase nationwide. The third harbor crossing will increase the average overall increase in traffic. The third harbor crossing will allow the non-Logan Airport traffic to flow more expeditiously and thus generally improve air quality because of a decrease in vehicle hours of travel. The third harbor crossing will also divert traffic from the Harbor Crossing, which will eliminate the existing and future traffic that the South Boston industrialized areas (from using regional streets).

Therefore, the SBOC prefers the third harbor crossing in concept as outlined in the Alternative 3A Design Modification only if it is included with the expressions and widening of the Central Artery.

Finally, there are still major unresolved negative impacts that must be fully addressed and minimized to the fullest extent possible. Briefly, they are:

- modification or elimination of the proposed extension of Dorchester Avenue from the Fort Point Channel;
 - design, location, and impact of the ventilation buildings;
 - realignment of the "tunnel box" to minimize its intrusion on the Fort Point Channel;
 - design inclusion of NYTA improved and preferential service to Logan Airport during construction period and completion;
 - improved access to Route 1A from Logan Airport;
 - design improvements to Herald Street, not East Bartley Street; to minimize traffic impacts on the South End residential neighborhood;
 - NYTA or other suitable transit connection between South end North Stations; and
- most important to this Commission, extensive and detailed anticipating measures addressing the air and noise pollution impacts during the twelve year construction period.

In closing, the City of Boston Air Pollution Control Commission and staff must be involved in all aspects of design and implementation. The Commission's Air Quality and Noise Pollution Regulations must be adhered to and this requires full participation with the BAPC. This Commission is looking forward to being an important part of this continued project in the years to come to ensure that the mandate of protecting the environmental quality of Boston's atmosphere is fulfilled.

For the Commission,

29th Nov

Geoffrey M. Boehm
Executive Director

cc: Mr. James Walsh, FNA
Mr. Robert McDonough, NCPW
Mr. Frederick Salvucci, EOTC

RESPONSE TO COMMENTS BY THE CITY OF BOSTON AIR POLLUTION CONTROL COMMISSION
(August 22, 1983)

332. Design of relocated Dorchester Avenue has been modified as presented in the Preferred Alternative (see Section 2.2.1 Description of the Preferred Alternative).

333. Air quality impacts of the proposed ventilation buildings are discussed in Section 4.7.5 Effects of Ventilation Building Emissions. Details of the design and final locations of the ventilation buildings will be performed during the design phase of the project to assure conformance with State air quality standards and policies.

334. The tunnel box has been realigned, both vertically and horizontally, to minimize intrusion into the Fort Point Channel.

335. The Preferred Alternative includes exclusive bus ramps from both the Third Harbor Tunnel (serving Logan Airport) and the Central Artery/Southeast Expressway/Massachusetts Turnpike to the South Station Transportation Center for use by both MBTA and private bus companies. During construction, the Commonwealth will pursue provisions of preferential service for MBTA transit use.

336. Improvements in access to Route 1A from the Airport are included in the Preferred Alternatives. See Section 2.2.1 Description of the Preferred Alternative).

337. This has been included in the Preferred Alternative. See Section 2.2.1 Description of the Preferred Alternative).

338. During coordination with the MBTA for their proposed Green Line relocation and commuter rail extensions at North Station, they have indicated that the reinstitution of transit (bus) service between North Station and South Station will be seriously considered. Displacement of residences and additional businesses along the Central Artery corridor would be necessary to provide rail service between North and South Stations.

339. See discussions throughout Section 4.7 AIR QUALITY and 4.8 NOISE AND VIBRATION for air and noise impact mitigation measures.

340. Coordination with the Boston Air Pollution Control Commission will occur during the design and construction phases. All relevant regulation will be adhered to during and after construction.

EDIC/Boston

Executive Director, Federal Corporation of Boston
18 Tremont St., Suite 300, Boston, MA 02108-6175-3342

RECEIVED

August 16, 1983

Mr. James S. Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

RE: Third Harbor Tunnel EIS

Dear Mr. Hoyte:

As the agency concerned with promoting industrial development in the City of Boston, EDIC/Boston basically supports the State's plan to develop the Third Harbor Tunnel. The tunnel will provide a new access to Logan Airport through a Third Harbor Tunnel, and to improve downtown traffic conditions by widening and depressing the Central Artery.

Our support for this effort must be qualified at this time by our need to obtain a satisfactory commitment to protect the interests of our industrial tenants in the Central Artery Industrial Park (CAIP), some of whom are located in the area between Summer Street and Northern Avenue. Our consideration unless certain arrangements are made well before construction starts.

Located in the industrial area between Summer Street and Northern Avenue, the SHIP (including the 1.5 million sq. ft. space at the present site) is the largest industrial facility in Boston. It is a major employer of over 1000 employees and a source of a variety of light manufacturing/distribution activities. Over the last 7 years the SHIP has served as a haven for industrial businesses no longer able to afford the rising costs of downtown locations.

Of the alternatives now being considered under the Final EIS process to improve transportation to and from this area, the "SA-Modified" alternative is the most promising. It makes the most sense and promises the greatest benefits to the SHIP and the surrounding industrial district. At the same time this alternative, especially during construction, would have the most direct impact on SHIP property and the operations of certain of our tenants.

Over the past two months we have met on several occasions with members of the "Joint Venture" consulting team who have been studying the impacts of the "SA-Modified" scheme would have on SHIP operations--long and short term--and the measures necessary to

Kevin M. White, Mayor



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avoid disruption to our tenants' business activity. Although we are fairly confident that the technical means are available to meet these concerns, we have as yet seen no actual commitment to undertake these mitigating measures. Until we can be assured that the funding for and willingness to undertake these measures is in place, we must continue to monitor the situation very closely -- notably "SA Modified" -- that takes these measures so important.

Our specific concerns and the measures we feel are necessary to protect our own and our tenants interests are set forth in some detail in the enclosed charts and memo, which were prepared and exchanged with members of the "Joint Venture" team in the course of our recent discussions. With reference to the enclosed maps, these concerns can be summarized as follows:

1. Impact on General Ship, Inc. Premises

The proposed "SA-Modified" tunnel alignment crosses Northern Avenue and bisects the area leased to the General Ship Corporation for ship repair activity. Tunnel construction would preclude use of several existing facilities, including the General Ship Corporation's office building, the General Ship Corporation's heart of the General Ship premises.

Mitigating measures must reflect not only practical necessities, but also sensitivity to the Navy's stringent security requirements for facilities where its vessels are undergoing repair. If the "SA Modified" is adopted preliminary analysis indicates the need to:

- replace Pier 5 by rehabilitating its twin, Pier 6, prior to tunnel construction.
- relocate the steam plant to the west of the proposed alignment.
- provide a convenient and secured replacement parking facility elsewhere at the SHIP for company employees and other contractors.
- construct a temporary facility west of the alignment to house material assembly operations.

2. Loss of SHIP Parking Lot Behind Building 19

This essential 250 car employee parking lot would be rendered unusable until the tunnel excavation here is covered and complete. A replacement facility convenient to the Buildings this lot now serves (17, 32 and 19) must be provided in advance of construction.

3. Impact on Bldg. 17 "Enant (Stavis Seafoods, Inc.)

Uninterrupted access to and from Northern Avenue is essential to the well-being of this business (as well as several other tenants). Other construction impacts (noise, dust, etc.) would be felt most sharply at Bldg 17 since its loading area faces the proposed alignment. Joint Venture consultants are contemplating a system of decour ramps to assure continued access to Northern Avenue. Careful construction phasing is essential to making it work.

18 Tremont St./ Suite 300 Boston MA 02108 617-725-3342

4. Impact on Summer Street Development Parcel

EDIC needs to create a new entrance to the BHP/BAP near Building 46 and west of that point, along Summer St., plan to develop a new parcel for Commercial/Industrial activity. Thus the location of the proposed Summer St. ramp is critical to the development of the Summer St. development parcel. In general, we need to maximize its size by making sure that the new entrance/exit is located as far west (toward downtown) as possible.

Earlier sketches of "SA Modified" showed this ramp even closer to this entrance, but joint venture engineers, indicating there was considerable flexibility in determining the location, have since moved it further west in response to our comments. As a result, the location of the ramp in these sketches are only preliminary, prepared without the benefit of soil information, more detailed traffic analysis and other factors which any final design would have to take into account. Moreover, we are not yet aware how much additional land may be required for easements alongside the proposed ramp/roadway. Consequently, EDIC has no assurance yet that the ultimate location of the ramp will permit a satisfactory development parcel.

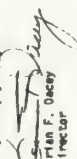
While we realize that the preliminary nature of the designs and alignments we have seen do not yet permit final technical answers to our concerns, the general impacts of "SA Modified" at the BHP are quite easy to discern. Our primary objective in drawing attention to these impacts now is to ensure that the design team is aware of the nature of the measures which have been identified, and which can be further refined, as solutions to these problems.

In summary, then, we support alternative "SA Modified" as long as adequate measures are taken to: (1) ensure the continued, unimpeded operation of General Ship Inc. at the BHP; (2) provide adequate replacement parking for the BHP; (3) ensure that the proposed ramp/roadway does not impede access to Northern Avenue and Summer Street for all users; and (4) ensure the location of the Summer St. ramp connection assure a feasible development parcel along that road.

With such commitments by the Commonwealth in hand, and the continued forward planning by the design team, EDIC will look forward to playing a constructive role in the planning of these important transportation improvements.

Thank you for your support and cooperation.

Very truly yours,


Brian F. Dacey
Director

BFD:PM

RESPONSE TO COMMENTS BY EDIC/BOSTON (August 16, 1983)

The Commonwealth acknowledges the critical importance of providing for uninterrupted operations at the Boston Marine Industrial Park. The particular impacts on the area leased to the General Ship Corporation are recognized. They have been considered in the design work reflected in the FEIS, and subsequent design work will go into greater detail to refine the mitigating measures required to provide for continued activity during the construction period. See Section 4.4.3 LAND USE IMPACTS for a discussion of construction period impacts and mitigation measures. Listed below are responses to the specific issues raised by EDIC.

341. Mitigation measures to ensure availability of facilities to continue operation of General Ship facilities owned by EDIC include provision of a temporary parking lot, materials assembly building, relocation of steam lines, and temporary relocation of operations on Pier 6. Specific measures will be worked out in later phases of design. At that time the Commonwealth will work with EDIC to determine all possible methods for allowing the continued operation of the General Ship facility in its present location, elsewhere on EDIC property, or in an acceptable alternative location during the estimated one year period of construction activity directly affecting Pier 6 and the adjacent drydock.

342. Replacement parking for the lot behind Building 19 at EDIC/BHP will be provided. Possible locations include the filled area which eventually will be the site of the new containerport facility, or space in undeveloped parts of the Commonwealth Flats area.

343. Access to Northern Avenue will be maintained during construction, and construction staging and appropriate mitigation measures will be followed to minimize construction impacts. Details of construction staging and detour ramp systems will be determined during later phases of the project.

344. The present design locates the Summer Street ramps approximately 600 feet from the proposed new entrance to the Boston Army Base, which should preclude any problems with access to that site.

During subsequent project design work, every effort will be made to avoid any encroachment on the proposed development parcel along Summer Street. Easements, if any prove necessary, would be for the construction period only.

To: Mr. James A. Walsh, Division Administrator
Federal Highway Administration
Transportation Systems Center
55 Broadway, 10th Floor
Cambridge, MA 02142

Mr. Robert J. McDonagh, Chief Engineer
Massachusetts Department of Public Works
100 Hudson Street, Room 330
Boston, MA 02116

From: Justin Gray
1791 Beacon Street
Waban, MA 02168

Date: August 22, 1983

Re: FHWA-MD-EIS-82-02-D, dated December 20, 1982
FHWA-MD-EIS-82-02-D, dated June 28, 1983

By Federal statute, an environmental impact statement must be presented according to guidelines issued by the Council on Environmental Quality (CEQ) Guidelines, August 1973, with current amendments; the Federal Highway Administration Policy, December 1973; and the Federal Register, December 1973. The Environmental Protection Administration's regulations relating to air, water, and noise quality.

The above cited Draft EIS and its Supplement, in my view, fail to comply in many areas as required by these Federal rules and regulations. In this communication I address four critical areas of non-conformance that, to the best of my knowledge, were not emphasized in the course of the public hearings on August 9 and 9, 1983. They are:

1. Selection of Alternatives

"A rigorous exploration and objective evaluation of the environmental impacts of all reasonable alternative actions... is essential." (underlining added)

SA Modified (known as the Bird Island Flats alignment) is not a modification of Alternative SA. The tunnel's portals in South Boston are different. The tunnel's alignments in East Boston are different. The extent of the tunnel's open-cut construction, in terms of both time and distance, is different. Impacts on Eastern Airlines and the Bird Island Flats air-cargo and commercial development are different. The location of the tunnel's ventilation structures and toll plazas are different.

* Council on Environmental Quality, "Preparation of Environmental Impact Statements", Guidelines, Federal Register, Wednesday, August 1, 1973, Volume 38, Number 147, Part II, at 50013.

To: Walsh/McDonagh
From: Justin Gray
Date: 8/22/83
Re: FHWA-MD-EIS-82-02-D and 03

Page 6.

The quantitative and qualitative differences between SA Modified and Alternative SA identified and described in the Supplement are not a modification of Alternative SA. The Supplement's "rigorous exploration and objective evaluation of environmental impacts..."

Identifying SA Modified as a separate Alternative, with its own environmental analysis, is not a matter of semantics. It is a substantive issue. By characterizing SA Modified simply as a modified version of Alternative SA, the Draft EIS and its Supplement seems to be suggesting that it is not necessary to discuss the primary and secondary impacts of SA Modified (see paragraph 2 below).

In my view, both the letter and the spirit of this Federal regulation has been violated by the Draft EIS and its Supplement.

2. Lack of Analysis of Primary and Secondary Impacts of SA Modified

"Secondary or indirect, as well as primary or direct, consequences for the environment should be included..."

Serious questions regarding the EIS's conformance with this Federal regulation are raised by the Supplement's failure to discuss, as well as its Appendices and Supplemental Reports. But EIS and its Supplement as well as Federal regulation is most flagrant in the June 1983 Supplement and its Appendices.

The Supplement to the Draft EIS and its Appendices virtually are silent regarding the primary or direct impacts of SA Modified. Literally, the public is informed on the Supplement's Appendix A that the Supplement will discuss and vibration traffic, water and use and economic, and design material disposal. More, although the construction period for SA Modified in East Boston is estimated to take a minimum of four and a half years and will disrupt in a major way during this construction period the operations of Eastern Airlines and multi-million dollar air-cargo and commercial development being built on Logan Airport's Bird Island Flats, no primary or direct environmental impacts have been evaluated for SA Modified.

As for secondary or indirect impacts, the Supplement is equally silent on such considerations as SA Modified's impact on the growth of Logan Airport. For instance, no data is available to the public on the airport's future impact on the Region's air and noise quality; vehicular circulation on the airport's internal roadway system and the airport-oriented land use and economic development that inevitably will encroach on the residential neighborhoods that border the airport.

In my view, both the letter and the spirit of this Federal regulation has been violated by the Draft EIS and its Supplement.

Op. cit., #F500.B.

To: Walsh/McDonagh
From: Gray
Date: 8/22/83
Re: FHWA-M4-EIS-82-02-D and DS

Page 3.

3. Draft Environmental Impact Statement Format

"Agencies should make every effort to convey the required information succinctly in a form easily understood, both by members of the public and public decision makers, giving attention to the substance of information conveyed rather than to the particular form, or length, or detail of statement." ^{see}

The Draft EIS and its Supplement, plus its Appendices and Supplemental Reports, are a model of non-conformance with this regulation.

In style, language, and form, the Draft EIS and its Supplement is most difficult to read and understand. Often, the document is incomprehensible to the layman and probably to the professional reader, as in its size and bulk -- some 35 pages of text and 100 pages of tables and figures. The document is virtually every chart and table requires an unbelievable amount of study and attention before their meaning can be comprehended. Some tables can not be deciphered because sources or methodological material is omitted. Most maps show the study's narrow corridor, leaving out the regional setting.

In my view, both the letter and the spirit of this Federal regulation has been violated by the Draft EIS and its Supplement.

4. Biased Presentation

"Agencies should keep in mind that such (environmental impact) statements are to serve as the means of providing interested parties with information on agency actions, rather than as a justification for decisions already made." ^{see}

All evidence suggests that the Draft EIS and its Supplement is biased in favor of the largest, most expensive of the Alternatives presented -- the Logan Airport. Alternatives of less cost and less impact, such as the Logan Airport through improved public and private mass transportation, were not studied. Boston's harbor transit potential was not explored in any serious manner.

Compelled with political and business pressure and extensive media coverage on the Draft EIS and its Supplement, the DOTC has left no question in the minds of the public that SL Modifies is the only proposal.

see Ibid., #1500.9.
Ibid., #1500.7.

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To: Walsh/McDonagh
From: Gray
Date: 8/22/83
Re: FHWA-M4-EIS-82-02-D and DS

The State of Massachusetts will recommend to the Federal Highway Administration. This bias runs so deep it is not unreasonable to predict that SL Modifies is the only Alternative for which the State will accept Federal Interstate Highway funds.

In my view, both the letter and the spirit of this Federal regulation has been violated by the Draft EIS and its Supplement.

Conclusion

The above discussion has centered on the Draft EIS and its Supplement's non-compliance with Federal rules and regulations. On August 6, 1983, the Coalition Against a Third Harbor Tunnel (CATT), of which I am a member, submitted for your consideration and response detailed comments regarding the Draft EIS in terms of the Massachusetts Environmental Policy Act (MSPA).

I fully support and endorse CATT's comments and add my thoughts as an amplification of CATT's August 6, 1983 memorandum.

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345. One of the five major alternatives analyzed in full detail in the SDEIS/SDEIR - Alternative 5A, a depressed Central Artery and a "Seaport Access Alignment Tunnel" - was supplemented by further analysis and discussion of several design variations collectively known as the "Alternative 5A Design Modification", now the Preferred Alternative. The Preferred Alternative was substantially similar to Alternative 5A in its major elements (depressed Central Artery and Seaport Access Alignment Tunnel emerging on Logan Airport), but included relocation of the tunnel portal further away from the Jeffries Cove residential neighborhood onto industrial, publicly owned properties. In addition, a toll plaza and a second interchange was added in the Commonwealth Flats industrial area, and a relocated Dorchester Avenue was added along Fort Point Channel.

These modifications were developed in response to specific public and community interests, expressed during preparation of the SDEIS/SDEIR at NEPA scoping meetings, Working Committee meetings, and informal neighborhood meetings with State officials, in (1) the possibility of a tunnel alignment entering the Airport at Bird Island Flats instead of Jeffries Cove in East Boston, and (2) improving the ability of the Seaport Access Alignment to divert commuter and truck traffic from South Boston residential streets. Because these community suggestions appeared to offer significant potential to improve upon or minimize the environmental impacts of Alternative 5A, substantive feasibility studies of the modifications were undertaken.

The results of the 5A Modification studies were reported in the SDEIS/SDEIR to amplify the discussion of Alternative 5A, and to solicit public comment on whether the environmental benefits suggested by the preliminary studies were sufficient to warrant further evaluation and consideration of the 5A Modifications. There was no effort to suggest that these preliminary studies represented a full impact analysis of the Alternative 5A Modification. Rather, the SDEIS/SDEIR explicitly recognized the need for detailed technical study of impacts if the Modification was carried forward after public comment to the Final EIS/FEIR. Such detailed analysis has in fact been performed and is included in the FEIS/FEIR.

Nothing in the applicable federal regulations, including those cited in this comment, precludes presentation of information on design variations to amplify and supplement discussion of a basic alternative in a DEIS/DEIR. On the contrary, the mandate of NEPA explicitly favors use of the EIS and public comment process to improve projects from an environmental perspective.

"A rigorous exploration and objective evaluation of the environmental impacts of all reasonable alternative actions, particularly those that might enhance environmental quality or avoid some or all of the adverse environmental effects, is essential." CRO regulations, 40 CFR s.1500.6, (emphasis added).

See also, for example, 40 CFR s.1500.9, encouraging commentators to recommend beneficial project modifications for study between the Draft and Final EIS/FEIR. The FHWA approved the SDEIS/SDEIR for publication as being in accord with applicable federal regulations; and Massachusetts Secretary of Environmental Affairs, James S. Hoyte, in his determination of the adequacy of the SDEIS/SDEIR, specifically approved the procedure of presenting design modifications which avoid impacts for public comment.

346. The information on the Alternative 5A Modification, while not intended or purporting to constitute a full impact analysis, did contain the

substantive results of preliminary feasibility studies of the variations. Included in the SDEIS/SDEIR were: Preliminary design information (for example, several engineering plans and profiles of the Alternative 5A Modification) were included in the Supportive Engineering Report; virtually complete impact analyses in areas such as land use, visual, economic, neighborhood, relocation and (f) impacts; and reasonable qualitative extrapolations from data about the very similar Alternative 5A in impact areas such as traffic, noise, water, dredged material disposal, and energy. Such studies and discussions were, at the very least, sufficient to inform the public for purposes of public comment. Detailed analysis for the FEIS/FEIR has for the most part borne out the preliminary study results in these various impact areas, and has also demonstrated that adequate mitigation measures are available to address localized construction impacts on Eastern Airlines and the Bird Island Flats developments during the three-to-four year construction period at the Airport.

With respect to the more general issue of Airport growth, transportation studies in a variety of regions clearly indicate that the growth rate of Airport activity is determined principally by powerful regional and national economic factors, and is not correlated with the quality of auto access (see Section 1.3 MAJOR POLICY ISSUES). Air passenger and air freight activity is consistently growing now, and will continue to grow with or without improved highway access. It is critical, therefore, that land use, noise, and other impacts associated with Airport growth be dealt with immediately by appropriate public bodies. A program to review the impact of zoning and other land use control mechanisms (including various de facto licensing by "passport of Airport-related industrial uses) will be undertaken immediately, as one element of the total program of mitigation to be included in the Preferred Alternative. Lifting the EPA ban on increasing on-airport parking is being pursued by the Commonwealth. The Commonwealth is committed to actively exploring the potential of other state-run airports to absorb air traffic growth, and to further soundproofing of schools, and, on an experimental basis, residences in East Boston.

347. The project, the wide range of alternatives, and the volume of material in the DEIS/DEIR and SDEIS/SDEIR, is a formidable review task for any reader. This is to some extent inevitable given the need to present complete technical analysis for each of the six major alternatives in each of 18 impact areas, as required by applicable federal and state regulations. The SDEIS/SDEIR did contain an index to the main volume, and a 24-page Summary was widely distributed by mail and at public meetings. Sources and methodologies for tables were included for the most part in the technical appendices, to avoid confusing the lay reader. Both regional and corridor maps were included; the latter are necessary to show the appropriate level of detail of impact evaluation.

In the FEIS/FEIR, the presentation is somewhat simplified because detailed comparison of impacts is focused on the Preferred Alternative. Several new tables and graphics have been added, the table of impacts in the SUMMARY has been simplified, and the index has been improved. In addition, a new Chapter 1 discusses key policy issues posed by many commentators, and a new Chapter 2 sets forth in one place the Commonwealth's reasons for choosing the Preferred Alternative and for not selecting the other EIS alternatives.

348. At the time of publication of the SDEIS/SDEIR, the Commonwealth had in no way made a choice among the build alternatives, and the SDEIS/SDEIR reflects a full and fair evaluation of each of the alternatives. The impacts of each are given equal attention and detail in the text. The advantages and disadvantages of each are discussed throughout the impact analysis. Also, while the SDEIS/SDEIR conformed to FHWA regulations in not stating a Preferred

Alternative and covering all of the alternatives equally, the same section of the CEQ regulations cited in this comment (40 CFR s.1500.7) allows statement of a Preferred Alternative even at the Draft EIS/EA stage. Furthermore, the "decision" being referred to in the quoted portion of the regulation is the federal agency's decision whether or not to fund the project. That decision has not been made, and will not be made until after FHWA completes its normal internal review of the FEIS.

This comment also states that better access to Logan Airport through improved mass transportation or harbor transit has not been studied as an alternative. Over the past two decades, a whole series of studies, including the Corridor Planning Study, a Blue Line EIS, and the December 1982 Third Harbor Tunnel DEIS/EA, have considered transit alternatives to the Airport. These studies are discussed in Sections 1.3 MAJOR POLICY ISSUES, 2.3 ALTERNATIVES CONSIDERED IN THE EIS PROCESS, and 4.2 TRANSPORTATION of the FEIS. From the result of these studies it is clear that while transit must be a major factor in access to Logan Airport, rail transit alternatives do not have the service characteristics to divert a substantial number of the 86 percent of Airport trips that currently arrive by automobile. A Blue Line "spur" to the general vicinity of the Central Parking Garage facility, for example, was found to have significant problems distributing passengers to the terminals, particularly the highly linear Southeast Terminal. Such a Blue Line spur would likely require a shuttle bus system similar to the present Massport Bus for some terminal gate destinations. A combined Blue Line spur and new Blue Line connection to the Red Line would increase the Blue Line's percentage of Airport trips from 64 to 94, but would increase headway (waiting time) for the majority of Blue Line riders who do not travel to the Airport. The most promising transit strategy, that of encouraging bus, van, and limousine access to mitigate traffic growth to Logan and supplement highway capacity, is part of the Preferred Alternative in the form of direct preferential bus access from South Station through the new tunnel to Logan, as discussed in Sections 1.3, 2.2, and 4.2 of the FEIS.

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August 22, 1983

Mr. Robert J. McDonagh, P.E.
Chief Engineer
Department of Public Works
Transportation Systems Center
55 Broadway, 10th Floor
Boston, MA 02114

Re: Third Harbor Tunnel/Central Artery
Boston, Massachusetts
EOEA No. 4325

Dear Mr. Walsh and Mr. McDonagh:

On behalf of Airport Impact Relief, Inc. (AIR, Inc.), I am writing to submit the following comments on the Supplement to the Draft Environmental Impact Statement/Report (SEIS/SDRIR) on the above-referenced projects.

AIR, Inc. is a non-profit corporation organized to protect the communities surrounding Logan Airport from the adverse impacts caused by the growth and operation of the Airport, and to work for the establishment of sound regional transportation policies. AIR, Inc. is a member of the Coalition Against A Third Tunnel (CAAT) and, therefore, adopts by reference the CAAT position on the Third Harbor Tunnel, which have been submitted to you on AIR, Inc. and submit the following additional comments on the SEIS/SDRIR.

1. Procedural Objections

AIR, Inc. strongly objects to the circulation for comment of a SEIS/SDRIR containing totally inadequate information about the one alternative being seriously considered by the responsible Federal agency, the so-called "Conceptual Alternative 5A Design Modification" of the Central Artery Depression and a Third Harbor Tunnel shifted easterly, is included in the SEIS/SDRIR only as "concept" without any basic data or design information. The public is promised that this alternative "will be studied in more detail during the FEIS/FEIR" (SEIS/SDRIR, p. vi), and that the FEIS/FEIR will

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include "further impact analysis at a level of detail comparable with the assessment of impacts of other build alternatives." (SEIS/SDRIR, p. 17). This totally misses the point.

The SEIS/SDRIR does not meet the requirements of 40 CFR Part 150.106, which requires the "final" quality of the Supplement to the Draft Environmental Impact Statement/Report (SEIS/SDRIR) to be "adequate" (301 CFR 15.00), which mandate that draft environmental impact statements/reports include detailed information about the proposed project, all reasonable alternatives, and their environmental consequences. The public has a right to review and comment upon a real project and not just a "concept". The responsible agencies are obligated to ensure that this right is protected by the issuance of a Supplement to the Draft Environmental Impact Statement/Report (SEIS/SDRIR) which meets the minimum requirements.

These procedural problems have been seriously compounded by the issuance of a scope for the Supplement Draft EIR and a decision on project change before the emergence of Alternative 5A Design Modification, which is the real project being pursued by the Project Proponents. Therefore, the scope of the Supplement Draft EIR is unduly restricted and does not address all potential impacts of the real project, as opposed to paper alternatives.

The following shortcomings in the information submitted about "Alternative 5A Design Modification" are noted:

- The description (pp. 15-17) is very general and contains a useless drawing (Figure 72) having no detail.
- Construction impacts (pages 103-09) are not discussed.
- Air quality analysis is totally missing, with the promise (page 207) this "will be performed during the FEIS/FEIR."
- Noise analysis (page 234-35) on the basis of a "qualitative comparison" with Alternative 5A is inappropriate, as discussed further below.
- Water resources impacts (pages 239-44) are at best stated in such general terms that meaningful analysis is impossible. In addition, the lack of adequate information

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interferes with the statutory responsibilities of the Environmental Protection Agency, U.S. Fish and Wildlife Service, and National Marine Fisheries Service to comment upon these projects.

2. Specific Noise Analysis Comments

It is not acceptable to analyze the noise impacts of Alternative 5A Design Modification by qualitative comparisons with Alternative 5A. For instance, if the tunnel ramps are in cut or at grade on Bird Island Plats, then the project noise levels will increase relative to the levels calculated for Alternative 5A. See pages 234-35. These noise impacts should have been quantified as part of the EIS/EIR process.

The construction noise calculations (page 13 of DEIS/DEIR, Appendix 6) result in overall noise levels for the various construction stages (clearing, excavation, foundation, erection, finishing) in the 88-93 dBA L_{EQ} range at 50 feet, which is low. A close look at the methods used to arrive at these levels (Table 7 of Appendix 6) suggests that the number of pieces of equipment assumed on site for each of the construction stages were very low for a project of this size. For the construction phases for tunneling, including Phase of equipment are assumed to be sufficient, including, among other things, one truck, one dozer, one crane and one rock drill. Such estimates are substantially, if not grossly, insufficient.

There is no mention of the noise regulations of the City of Boston Air Pollution Control Commission, which include restrictions on construction noise of 86 dBA for residential or institutional sites.

Alternative 5A Design Modification will require (SDZIS/SDZIR, 189) relocation of the Eastern Shuttle Service from the Eastern Terminal west satellite to a "temporary/permanent" satellite facility at the south end of this terminal, if the more likely option of a cut-and-cover tunnel is selected. The west satellite gates would then be used for small commuter aircraft. The impact of these changes on the operation of the Bird Island Jeffries Point, and the effect around the Bird Island Jeffries Point, and the associated noise barriers, should be assessed as part of this proposed alternative.

3. Specific Air Quality Comments

The following comments are made with respect to the air quality analysis in the SDZIS/SDZIR:

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a. It is not clear that the "worst case" situation was used in calculating vehicle emissions.

b. The construction impacts section (page 226-28) is poorly documented and contains only the most general statements without any specific analysis of impacts.

c. The figures for traffic volumes as a result of tunnel construction do not appear to give any break-down between passenger vehicles and vehicles used for cargo and other goods movement.

d. The analysis of carbon monoxide emissions does not compare the results of the proposed project with actual field measurements to determine the accuracy of the model.

4. Other Comments

The draft and supplemental EIS/EIR's barely discuss the Bird Island Plats air cargo and mixed use development projects, and the potential conflicts or interaction between the BIR projects and the proposed third tunnel. Air, Inc. is concerned about the impacts of the proposed tunnel on the existing tunnel, as well as the impacts from tunnel traffic flow, exit ramps, and traffic itself, could have a serious and perhaps crucial adverse impact upon the Massachusetts Technology Center development at BIR. Since this development is designed to serve as a buffer and transition zone between the southwest area of the Airport and the Jeffries Point community, we would be seriously concerned if the Alternative 5A Design Modification, or any of the alternatives, delayed or interfered with this development in any material respect.

Furthermore, the SDZIS/SDZIR fails to discuss the effects on the communities surrounding Logan Airport of the increased passengers and air cargo activity which will be generated or facilitated by the ground-side capacity improvements of the new harbor tunnel. What will be the noise, traffic, land use, community disruptions, and other impacts of the Airport growth induced by the new tunnel? These crucial issues are not even addressed in the SDZIS/SDZIR, but should have been.

The SDZIS/SDZIR does not show the precise configuration of exit/entrance ramps so as to be able to evaluate the traffic impacts on the Airport roadway system and surrounding neighborhood streets. Already the communities bordering the Airport are plagued by excessive Airport related traffic

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problems from air cargo vehicles, taxis, trucks, rental cars, vans and passenger traffic. This traffic causes problems of safety, noise, and community disruption. The draft reports should have analyzed what additional problems would be created by the new tunnel.

The SDEIS/SEIR contains inadequate discussion of mitigation measures proposed to deal with the impacts of the new tunnel.

Neither the draft nor supplemental draft documents give a realistic picture of the possibility that the amount of federal funding available for the tunnel will be considerably less than 50% of the project cost. The draft reports do not discuss how to finance the local share by major increases in tolls on the existing tunnels, the Mystic-Robin Bridge, and the new tunnel. The effects of this toll policy on giving the MFTA Board a rationale for raising transit fares, with adverse effects on ridership and environmental quality, are totally ignored.

The SDEIS/SEIR barely treats the issue of energy consumption during construction of the project.

4. Conclusion

In light of all of the above problems, AIR, Inc. suggests that a new proper draft EIS/SEIR be circulated for comment before proceeding further with the tunnel project.

Sincerely yours,

Peter L. Koff
Peter L. Koff

PLK:bw
cc: Secretary James S. Boyte,
Executive Office of Environmental Affairs

RESPONSE TO COMMENTS BY AIR, INC. (August 22, 1983)

349. One of the five major alternatives analyzed in full detail in the SDEIS/SEIR - Alternative 5A, a depressed Central Artery and a "Seaport Access Alignment Tunnel" - was supplemented by further analysis and discussion of several design variations collectively known as the "Alternative 5A Design Modification"; the Design Modification has subsequently been refined and includes many features recommended during the public review and at the Public Hearings, and is now the Preferred Alternative. The Modification was substantially similar to Alternative 5A in its major elements (depressed Central Artery and Seaport Access Alignment Tunnel emerging at Logan Airport), but included relocation of the tunnel portal further away from the Jeffries Cove residential neighborhood onto industrial publicly owned properties. In addition, a toll plaza and a second interchange were added in the Commonwealth Plaza industrial area, and a relocated Dorchester Avenue was added along Port Point Channel.

These modifications were developed in response to specific public and community interests, expressed during preparation of the SDEIS/SEIR at NEPA scoping meetings, Working Committee meetings, and informal meetings of neighborhood residents (including individual members of AIR, Inc.) with State officials, in (1) the possibility of a tunnel alignment entering the Airport at Bird Island Plaza instead of Jeffries Cove in East Boston, and (2) improving the ability of the Seaport Access Alignment to divert commuter and truck traffic from South Boston residential streets. Because these community suggestions appeared to offer significant potential to improve upon, or minimize the environmental impacts of, Alternative 5A, substantive feasibility studies of the modifications were undertaken.

At the time of publication of the SDEIS/SEIR, Alternative 5A as well as several other build alternatives were under serious consideration by State officials. The results of the preliminary 5A Modification studies were reported in the SDEIS/SEIR to amplify the discussion of Alternative 5A, and to solicit public comment on whether the environmental benefits suggested by the preliminary studies were sufficient to warrant further evaluation and consideration of the Alternative 5A Modification. The Commonwealth recognizes that presentation of available information about the Modification added to the complexity of an EIS document that already included a substantial number of alternatives and large amounts of technical data. However, the Commonwealth felt it was important that public comment be as informed as possible, to the extent of available information, about the feasibility of implementing measures specifically requested by community groups to improve project alternatives. The information presented included: preliminary design information (for example, several engineering plans and profiles of the Alternative 5A Modification were included in the Supportive Engineering Report); virtually complete impact analyses in the areas such as land use, visual, neighborhood, historic, relocation, and air impacts; and reasonable qualitative extrapolations from data about the very similar Alternative 5A in impact areas such as traffic, noise, water, dredged material disposal, and energy. This information was certainly sufficiently detailed to allow for intelligent public comment on the modifications.

This presentation of the Alternative 5A Modification was fully in accord with the requirements of NEPA, MPA, and their implementing regulations. As this comment points out, the mandate of these environmental disclosure statutes is that the EIS include detailed information about the proposed project, all reasonable alternatives, and their environmental consequences. Nothing in the applicable regulations precludes discussion in

an EIS/FEIR of further variations to one of the basic alternatives, or requires that available information about potentially beneficial variations be withheld from the public simply because analysis has not been completed to the same level of detail as for the basic alternatives. On the contrary, the mandate of NEPA and NEPA favors the fullest possible disclosure of available information about reasonable alternatives, and assessment of their impacts for the very purpose of improving projects from an environmental and community perspective. Failure to consider and study beneficial design variations would itself violate at least the spirit, and perhaps the letter, of NEPA and NEPA regulations. For these reasons, among others, the FHWA approved the SDEIS/FEIR for publication as being in accordance with applicable federal regulations; and Massachusetts Secretary of Environmental Affairs, James S. Hoyer, in his determination of the adequacy of the SDEIR, specifically approved the procedure of presenting for public comment design modifications which avoid impacts.

350. The NEPA scope issued for the SDEIR did recognize the possibility of "additional variations in ramp design or tunnel location," including particularly the possibility of a Bird Island Plats tunnel alignment, and required that they be discussed qualitatively in the Supplemental Draft. The general scoping directions of the Amended Scope referenced the full range of impacts and issues to be considered for each alternative, and as such is now fully applicable to Alternative 5A Modified as the Preferred Alternative in the Final EIS/FEIR. There is no evidence that this list of topics and issues is not equally applicable to Alternative 5A and to the very similar 5A Modification; nor did the Secretary of SOEA, upon reviewing the adequacy of the SDEIS/FEIR, find any reason to comment on or expand the original scope.

351. As discussed in the response to comment number 1 above, information on design variations need not be presented in full technical detail to be useful for soliciting comments and seeking to reduce environmental impacts. Although significant preliminary evaluation of the Alternative 5A Modification was presented in the SDEIS/FEIR, certain technical areas were studied in detail in the Final EIS/FEIR.

- a. In addition to the general description and drawing of the Alternative 5A Modification in Chapter 2, detailed plans and profiles for both the East Boston and South Boston portion of the 5A Modification are included in the Supportive Engineering Report to the FEIS/FEIR.
- b. The discussion in Section 4.1 of the SDEIS/FEIR, pp. 103-109, regarding construction issues, included material on sunken tube construction, cut and cover tunnels, depressed Central Artery construction, utilities, and construction period mitigating measures, was generally applicable to all of the build alternatives. Detailed analysis of construction sequencing for the Alternative 5A Modification has been included in the Final EIS/FEIR (for the Preferred Alternative).
- c. Air quality analysis for the Alternative 5A Modification was performed for the FEIS/FEIR and is reported in detail in Section 4.7.
- d. See response to comment number 352, below.
- e. Water resource impacts were evaluated qualitatively in the SDEIS/FEIR for the Alternative 5A Modification, which was identical

to Alternative 5A in the Fort Point Channel and similar, except for a shorter tunnel length, in Boston Harbor. Preliminary analysis by specialized water quality subconsultants concluded generally that the impacts of the 5A Modification on Boston Harbor water quality would be similar to that of Alternative 5A, except there would be no impact on Jeffries Cove. The shorter tunnel length actually reduced dredging requirements and subsequent impacts on aquatic life, dredged material disposal requirements, effects on navigation, etc.

Subsequent detailed water resource analysis in the FEIS/FEIR has essentially confirmed these conclusions; see Sections 4.9-4.13. Because of the modifications to the Preferred Alternative in the Fort Point Channel, the impacts are actually less than for the Previous Alternatives. The U.S. Army Corps of Engineers and the U.S. Fish and Wildlife Service accepted the assessment of water-related impacts from dredging in the SDEIS/FEIR and the commitment to perform additional biological analysis of the sediments along the Preferred Alternative's harbor crossing alignment during the design phase. The requirements of the permit applications will be met.

352. Qualitative analysis of the noise impacts of the Alternative 5A Modification, because of the general similarity to Alternative 5A of alignment and traffic volumes, was a reasonable method for giving readers an overall sense of noise impacts. The SDEIS/FEIR, p. 234, also expressly recognized that noise levels at some specific sites could potentially change due to the alignment shift to Bird Island Plats, and that further quantitative analysis was required.

A detailed analysis of the noise impacts of Alternative 5A Modified has been prepared and is presented in Section 4.8 NOISE AND VIBRATION of the FEIS/FEIR. This analysis concludes that the noise impacts of the Preferred Alternative are less than for Alternative 5A, as is discussed in the Comparison of Alternatives in Section 4.8. Construction period noise impacts of Alternative 5A Modified are similar to those of Alternative 5A in the South End, South Boston, along the Central Artery Corridor and in the North Station and Charlestown areas; in East Boston, construction period noise impacts are less than those of Alternative 5A, with the exception of construction period noise impacts at East Boston Memorial Stadium, where noise impacts are greater.

353. Regarding noise impacts during construction, details of the actual types and numbers of construction equipment on the site(s) cannot be accurately determined until the design is actually completed. The construction noise impacts were assessed on the basis of proto-typical construction equipment used on roadway construction projects. The impacts were stated as being "substantial", resulting in greater than 15 dBA increases. Noise impacts are not totally dependent on the number of pieces of construction equipment on the site, but relate to how much each piece is utilized and how well it is equipped with mufflers, etc.; the statement that substantial impact would be expected is accurate. The FEIS/FEIR notes that mitigation to conform with City of Boston Noise Ordinances will be incorporated in the project. During design, the detailed construction noise analysis will be performed (and mitigating measures designed as necessary), so that compliance with Boston Air Pollution Control Commission regulations are achieved.

354. The FEIS/FEIR noise impact analysis at Logan Airport includes an assessment of the effects of relocating the satellite of Eastern Airlines

Shuttle Service: see Section 4.8. The assessment identifies the need to provide a noise barrier in this area during the construction activities if the Eastern Reservations Center is removed by the project (it may be possible to refine the tunnel alignment further to allow underpinning of the Reservations Center rather than its removal--this will be determined at a later design phase).

355. The Air Quality Appendices to both the SDEIS/SDEIR and the DEIS/DEIR indicated that the following conservative assumptions were used in estimating the emission factors for motor vehicles:

- o Cold 100% for CO (CO increases with lower temperatures) and 750% for NO_x and NMHC (these emissions increase with lower temperatures);
- o Mix of hot and cold start allowed to vary depending on the averaging time period - e.g., for one hour, a higher cold percentage was used resulting in higher CO values;
- o VMT mix specified in Massachusetts vehicle population except in heavy truck routes where route-specific VMT mixes were assumed;
- o Massachusetts vehicle age distribution which is generally "older" than the national mix and therefore resulting in higher average emissions;
- o No Inspection/Maintenance credits taken - even though the Commonwealth's I/M program was already in place as of April 1983.

All of these assumptions would lead to a conservative estimate. All of these modeling assumptions were agreed to by both EPA Region I and DEQ. See also responses to comments by both EPA and DEQ regarding Air Quality.

356. The construction impact analysis was meant to be qualitative from the outset. The assessment concentrates on identifying potential adverse impacts and possible mitigating measures. Both the DEIS/DEIR and the FEIS/FEIR indicate that when detailed routing and associated traffic volumes are developed (e.g., during the design stage), more detailed analysis of the potential air quality impact will be performed to ensure compliance with the applicable air quality standards.

357. The EPA's data base and procedure for estimating motor vehicle emission factors provide for individual accounting of about eight different categories of motor vehicles. The emissions - both in terms of rates and chemical make-up - would vary according to the type of power plant (i.e., gasoline vs. diesel-powered) and the engine size (as manifested in gross vehicle weight). The end use for a given vehicle category would not affect the emission factor - for example, a light-duty gasoline-powered vehicle carrying cargo and other goods would emit the same amount if it were carrying passengers. Consequently, from an air quality standpoint, the differentiation between cargo- and passenger-carrying vehicles would have little utility in the air quality modeling analysis.

358. From discussions with EPA I and DEQ during the beginning of the study, it was decided by these agencies that the FWA CALINE 3 dispersion model (which was used in estimating CO concentrations) should be used as is without further calibration. The accuracy of the model has undergone extensive calibration and validation during its development and these results are fully available.

(in the "User's Manual" for this model). However, it is still interesting to note that for the most part, the limited measurements at various parts of the Central Artery corridor area do reflect quite well the modeling prediction for existing conditions (e.g., compare modeling results in Table 88 and 89 with measurements given in Appendix 5 to the DEIS/DEIR). Furthermore, although WHEP 200 conditions were met by the air quality monitoring effort, DEQ and EPA decided that higher values for background concentrations should be used in the analysis. The results are therefore on the conservative, or high, side.

359. Particular attention has been paid to mitigating construction impacts which might delay or adversely affect the Massachusetts Technology Center. Construction of the project will be staged, and staging areas appropriately located, to avoid impacts on the Massachusetts Technology Center.

Construction vehicles will use a separate haul road parallel to the Bird Island Plaza access road, rather than the BIP access road. Most construction activity will take place on the Airport side of the existing Bird Island Plaza noise control wall, which will tend to shield the Technology Center from the effects of tunnel construction. Minor detours of the BIP access road will be required during certain portions of the three-to-four year construction period in this area; these detours will not significantly affect access to Bird Island Plaza. It appears that it will be possible to route the BIP access road in such a way that it will not pass over the tunnel construction site during any phase of construction. Further studies will refine the project design to replace the currently existing direct right turn to Bird Island Plaza from the inbound access road. Noise, dust, and vibration controls will be required near Massachusetts Technology Center structures. (See also response to comments to Mr. Anthony Pandaro, Massachusetts Technology Center Associates). In the long-term, the project will significantly enhance the development and market value of the Technology Center because of improved access.

360. Transportation studies in a variety of regions clearly indicate that the growth rate of Airport activity is determined principally by powerful regional and national economic factors, and is not correlated with the quality of auto access (see Section 1.3). Air passenger and air freight activity is consistently growing now, and will continue to grow with or without improved highway access. It is critical, therefore, that land use, noise, and other impacts associated with Airport growth be dealt with immediately by appropriate public bodies. A program to review the impact of zoning and other land use control mechanisms (including various de facto licensing by Massport of Airport-related industrial uses) will be undertaken immediately, as one element of the total program of mitigation included in the Preferred Alternative. Lifting the EPA ban on increasing on-Airport parking is being pursued by the Commonwealth. The Commonwealth is committed to actively exploring the potential of other state-run airports to absorb air traffic growth, and to further soundproofing of schools, and, on an experimental basis, residences in East Boston. The Preferred Alternative is not expected to generate new development and related activity at the Airport; impacts from new development at the Airport are beyond the scope of this project.

361. Exit and entrance ramps onto the Airport roadway system for all tunnel alternatives discussed in the SDEIS/SDEIR were stated to be the same as those shown in the December 1982 Third Harbor Tunnel EIS (see P. 8 of SDEIS/SDEIR), and were shown in the SDEIS/SDEIR Supportive Engineering Report. Section 4.2 of both the SDEIS/SDEIR and the FEIS/FEIR fully analyze traffic impacts of the new tunnel on the Airport roadway system and on a number of East Boston neighborhood streets and intersections. The Preferred Alternative will generally reduce traffic and improve levels of service on East Boston local

streets, as Airport traffic is handled on properly designed regional highways instead of utilizing local streets to bypass congested areas around the existing tunnels. For example, the Preferred Alternative will result in the lowering of traffic volumes on Porter Street, and on the Airport access road as it passes by the East Boston Memorial Stadium.

362. Numerous mitigating measures were described in each impact discussion in the SDIS/SEIR for all alternatives, and are refined and described in greater detail in each impact section of the FEIS/FEIR.

363. Specific funding issues are not included in the environmental concerns required to be addressed as part of the EIS/FEIR process. Federal funding decisions cannot be made until the FEIS/FEIR is reviewed and approved. The Commonwealth has proposed and intends to seek full funding of the Preferred Alternative. There may be certain elements of the Preferred Alternative, however, that are not eligible for the full 90 percent funding or for FHWA funds at all.

If the entire 10 percent local share were to be funded by tolls, the estimated tolls for the new tunnel, the existing tunnels, and the existing Mystic-Boon Bridge would increase to only 45¢ each way. (This increase would be less if, as is also possible, some of the local share is funded with general state revenues.) Any toll increase would not affect MBTA fares. As this commentor knows, the EOTC and the Commonwealth generally are fully committed to containing MBTA fares and to all possible measures to increase transit ridership.

364. Details of energy consumption during construction of the project were presented in the Supportive Engineering Report (Chapter 10); Section 4.17 of the SDIS/SEIR summarized that presentation. The construction energy consumption calculation was based on a number of factors, including the estimated quantities which were computed for the construction cost estimate, and was prorated to account for the estimated useful lives of the various project elements. The FEIS/FEIR also presents the energy impact analysis of the Preferred Alternative (with a comparison to all other EIS/FEIR alternatives). Even after expending the energy to construct the Preferred Alternative, the new facility will result in only a slight increase in energy use because of the significantly improved operating conditions.

66-9-14

STONE & WEBSTER ENGINEERING CORPORATION

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APPROVED FOR SUBMITTANCE TO P.A. AND MASS. HIGHWAY DEPT. BY P.E. 0187



Frederick P. Salimucci
Secretary of Transportation and Construction
Commonwealth of Massachusetts
One Ashburton Place
Boston, MA 02108

August 22, 1983

Dear Mr. Secretary:

We appreciate the time your associates spent with us to brief our senior management on the Third Harbor Tunnel and Depressed Central Artery project. As you know, Stone & Webster Engineering Corporation is a Boston-based, worldwide engineer-constructor and our headquarters office is located along the Fort Point Channel in proximity to the South Station Tunnel of the Central Artery. We currently employ over 5,000 persons in Boston, all of whom are vitally dependent upon the downtown transportation system.

Our company has grown over the years along with the region's developing activities. Our objective is to continue our growth through greater service to persons in our community, the Commonwealth of Massachusetts. The transportation environment within the Mass Bay Area is vital to that growth. Access to and from the office and Logan International Airport has become increasingly burdensome; and unless major improvements are undertaken promptly, our operations will be adversely impacted.

We, therefore, endorse the Massachusetts Department of Transportation's overall objective of making these essential improvements for the long term.

To date, we have not been contractually engaged in any planning, study, or engineering activity for improving the Central Artery or constructing a Third Harbor Tunnel; nor have we studied in detail the proposed alternatives from an engineering point of view. However, we share the general concerns for the upkeep and improvement of our "choked" and deteriorating Central Artery and harbor tunnel system which provide such a vital link into and out of this area. We hope it will be possible to move ahead toward constructing these vital highway links with support from the Federal Highway Trust Fund.

We specifically endorse the Third Harbor Tunnel and Depressed Central Artery concepts. We have specific concerns with regard to the proposed new Dorchester Avenue exit onto Summer Street which will result in traffic congestion in this area with severe impact not only on our operation, but others in this area. We are confident that there are better alternatives that would achieve the objectives of the project. In this regard, we have initiated discussions with your staff to address the alternatives.

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August 22, 1983

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We will work with you to accomplish the objectives of this project which are so important to the continued growth of Boston.

Very truly yours,

T. J. Whelan

T. J. Whelan
Vice Chairman of the Board

Copy to: Robert T. Tierney
Robert McDonagh

RESPONSE TO COMMENTS BY STONE & WEBSTER CORPORATION

No response necessary.

Brian B. Kendall
Executive Vice President
and Chief Operating Officer
Downtown Crossing Association
100 Nassau Street
Boston, Massachusetts 02111
(617) 452-1139



August 22, 1983

Mr. Robert McDonagh
Chief Engineer
Massachusetts Department of Public Works
100 Nassau Street
Boston, Massachusetts 02116

Dear Mr. McDonagh:

The Downtown Crossing Association enthusiastically endorses the Full-build option as described in the SA alternative for the Third Harbor Tunnel/Central Artery project. As a private, non-profit organization representing more than 175 businesses geographically located within the central business district, the Association's decision to support this option followed a review and discussion of selected material contained in the Environmental Impact Statement and the recently released study report of the Greater Boston Chamber of Commerce's Technical Artery Committee.

The Downtown Crossing has made great strides in the last few years and while we are concerned with maintaining this current economic vitality, we also want to progress towards realizing the goals for the future of our City. Improving traffic and transportation systems into the downtown must be achieved if we are to ensure Boston's economic health, growth and development.

We are confident that building the Third Harbor Tunnel and depressing the Central Artery will provide the best means of improving access into the City, and are therefore pleased to actively support the proposal by the State Department of Transportation for federal funds to underwrite the cost of this important project.

Sincerely yours,

Brian B. Kendall
Brian B. Kendall

BKK:ab

RESPONSE TO COMMENTS BY DOWNTOWN NORTH ASSOCIATION

No response necessary.

August 22, 1983

Mr. Robert J. McDonagh, Chief Engineer
Mass. Department of Public Works
100 Harrison St.
Boston, MA. 02114

Dear Mr. McDonagh:

Because I work and shop in Boston, I have strong opinions about the recent proposals. I am a critic of the proposed depression. I am in favor of a third tunnel. Also, I have ideas that would improve traffic in general.

The depression of the artery . . .

would be a great expense;
would take twelve years to complete;
would virtually isolate the North End during construction;
would eliminate the directness of the connection between the downtown district and the Summer and Chatham tunnels;
would eliminate much of downtown's parking space;
would call for the construction of a network of overpasses;
would prevent certain police and fire apparatus from giving quick assistance to other precincts;
would call for the elimination of the roadways that are presently under the artery;
would, because of its lengthy construction, discourage tourism and inconvenience motorists.

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Mr. R. J. McDonagh

-2-

August 22, 1983

The following suggestions, if implemented, would relieve the congestion in the existing tunnel within one month:

1. Eliminate the pedestrian light at Cross St. and replace it with a simple underpass at Sales and Cross Sts. If this is done neither cars nor people will need to stop.
2. Make Hanover St.'s traffic one-way, with its traffic flowing away from Cross St. This will prevent tunnel flow from stopping every time a bus or truck leaves Hanover St.
3. Eliminate parking on Cross St.
4. Remove the enormous sign at the mouth of the tunnel, as its arrows are only confusing.
5. Remove the great mass of concrete that is presently at the mouth of the tunnel. Its removal would make room for a third lane.
6. Remove the 20 foot concrete wall that prevents traffic from entering Rt. 93 N.
7. Remove the concrete sidewalk on right side of tunnel between it and Hanover St.
8. Make North St. two-way.
9. Leave the gate permanently closed so that no cars can ever interfere with those coming out of the tunnel.
10. Put back proper signs for Rt. 93 N. and S., but locate them in separate spots.
11. Put either a fence by the ramp wall or a sign in order to attract people to the underpass.
12. Cars that come from the tunnel and into the northerly traffic flow on Rt. 93 should be in the left lane as they enter.

Third Harbor Tunnel

The suggestion to build a third harbor tunnel, in the opinion of many, is a good one. However, when building it, the engineers should . . .

Mr. R. J. McDonagh

-3-

August 22, 1963

1. Acknowledge the fact that the earth's oil supply is small, and will probably be exhausted by the year 2020; a date that will arrive shortly after the tunnel's completion.

2. It should be constructed, then, in a way that would make it easy to convert the roadway into a railway system. It would also require that room be left for potential train platforms, and that the whole line be bent towards an easy connection with South Station.

3. Don't repeat the mistakes that I have mentioned earlier.

Southeast Expressway

When reading the following, consider the fact that, for the last 15 years, the Southeast X-Way has an accident rate that is twice the National average.

Breakdown Areas

1. The breakdown lane should be given to twenty-four hour travel. The purpose that it now serves could be accomplished by off-road areas.

2. These breakdown areas should be on both the right and left sides of the road, with those areas on the Northbound traffic's left being adjacent to those on the Southbound traffic's right, allowing both areas to share one set of facilities (phone, etc.).

3. Off-ramps should also have "breakdown" areas, allowing exiting traffic to flow freely in the case of an emergency.

4. Breakdown areas, of course, should be stocked with helpful aids.

Ramps

1. Narrow "on-ramps" so that cars aren't forced to compete with each other, and, in some cases, enter the X-Way in pairs of two.

2. Remove all that might obstruct the vision of a motorist while he/she enters the X-Way, as it is lack of vision that causes most accidents.

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Mr. R. J. McDonagh

-4-

August 22, 1963

3. Install off-ramp at Freeport St., Dorchester.

General

1. The X-Way should have a system of informing motorists of trouble. Hence, there should be a line of information signals that light the number of the lane that is having trouble. This way, if a motorist is broken down, he can inform on-coming motorists of his trouble by throwing a switch in the breakdown area. In doing so, he would prevent congestion.

2. There should be a double solid line preventing motorists from driving into high-speed lanes until they have reached the certain speed that is appropriate for travel in the specified lane.

3. When resurfacing the road, the new pavement should be rough. This would prevent hydroplaning.

4. Bridge's steel joints should be coarse in order to prevent slipping.

Regardless of the outcome of the proposals, I wish that you would consider my suggestions. You will find that most are practical and inexpensive.

Very truly yours,

Peter J. Kehoe
Peter J. Kehoe

Peter J. Kehoe
137 Bradlee Rd.
Milton, Ma. 02136

Tel. 725-4735 thru 4739 (Business phone)

365. The Commonwealth is committed to maintaining stability and quality of life in the North End. Provisions to assure pedestrian access to and from the area will be carried out, and traffic controls will be instituted to minimize the diversion of traffic to North End streets. For a more detailed description of measures to ensure access to the North End, see Sections 4.4.3 Preferred Alternative (re. land use) and 4.5.3 Preferred Alternative (re. neighborhood and community facilities impacts) in the FEIS/FEIR.

366. Although the project will eliminate direct connections from the northbound Central Artery to the Callahan Tunnel and from the Sumner Tunnel to the southbound Central Artery, the new Surface Artery and local street system has been designed specifically to replace those movements and to provide the desired access to downtown. Many of the drivers wishing to make the above mentioned movements will use the new Third Harbor Tunnel rather than the existing tunnels.

367. The project will not eliminate downtown parking spaces. Displaced under-artery and publicly-owned parking spaces will be replaced by the project prior to commencement of construction (see Sections 4.4 LAND USE IMPACTS and 4.5 NEIGHBORHOOD AND COMMUNITY FACILITIES IMPACTS in the FEIS/FEIR). In addition, there is the possibility that some of the potential air-rights development above the depressed Central Artery could be used for parking.

368. The design of the Preferred Alternative does not require the construction of a network of overpasses (see FEIS/FEIR Section 2.2 PREFERRED ALTERNATIVE).

369. Emergency vehicle access improvements directly result from the design features of the Preferred Alternative. This alternative provides more substantial time savings than any of the other alternatives and, therefore, provides the most benefits to emergency vehicle access (see FEIS/FEIR Section 4.2 TRANSPORTATION).

370. As part of this project, the surface roadways along and crossing under the existing Central Artery will be rebuilt in approximately their present locations, where possible. A surface arterial street connecting Atlantic Avenue with Causeway Street (one-way northbound), and Causeway Street with Purchase Street (one-way southbound) will also be built (see FEIS/FEIR Section 2.2 PREFERRED ALTERNATIVE and Section 2.5).

371. Measures to improve access and traffic congestion around the Callahan/Sumner Tunnels will continue to be examined during the subsequent design phases of this project. Suggestions from interested parties will continue to be solicited and considered during these later design phases; public participation has been an important part of the design process to date.

372. During the very early stages of this study, consideration was given to including a rail track in the depressed Central Artery tunnel. The narrow corridor, however, prohibits the inclusion of such a track without causing residential and additional business displacements. Because the alignment runs so closely between North and South Stations, it is possible that, if necessary at a future time, the conversion of the tunnel to rail use could possibly be accomplished if circumstances led to discontinuance of its present proposed use.

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ROBERT J MC DONAGH
CHIEF ENGINEER DEPT OF PUBLIC WORKS
100 WASHUA ST
BOSTON MA 02118

CHIEF ENGINEER
RECEIVED
AUG 21 1983

THIS WILL CONFIRM THE CONCURRENCE OF THE AMERICAN BUS ASSOCIATION IN
THE TESTIMONY RECENTLY GIVEN TO YOU BY FRANK TROMBLY, PRESIDENT,
TROMBLY MOTOR COACH SERVICE, INC., NORTH ANDOVER, MASSACHUSETTS,
CONCERNING CONSTRUCTION OF A THIRD TUNNEL UNDER BOSTON HARBOR AND
CONDEMNION OF THE CENTRAL ARTERY. BOTH OF THESE PROJECTS ARE INDEED
OF THE UTMOST IMPORTANCE AND TIMELINESS. WE SUPPORT AND ENCOURAGE
YOUR EFFORTS TO BRING THEM TO FRUITION AS THEY WILL GREATLY BENEFIT
THE PUBLIC BY IMPROVING BUS OPERATIONS IN THEIR ABILITY TO PROVIDE BETTER
SERVICE TO THE TRAVELLING PUBLIC.

CC: FRANK J TROMBLY PRESIDENT
CCI TROMBLY MOTOR COACH SERVICE

SINCERELY,

NORMAN R SHERLOCK PRESIDENT AMERICAN BUS ASSOCIATION
1925 CONNECTICUT AVE NORTHWEST SUITE 306
WASHINGTON DC 20036

10156 EST
HMCOMP

RESPONSE TO COMMENTS BY AMERICAN BUS ASSOCIATION

No response necessary.

ASSOCIATED
INDUSTRIES
OF MASSACHUSETTS

442 BOSTON STREET
BOSTON, MA 02116
(617) 261-1166

August 19, 1983

Mr. Robert J. McDonagh, P.E.
Massachusetts Department of Public Works
Room 530
100 Nashua Street
Boston, MA 02114

Dear Mr. McDonagh:

In re Third Harbor Tunnel, Interstate 90/Central
Artery, Interstate 93
Boston, Massachusetts

The Associated Industries of Massachusetts supports the action of the Board of Directors of the Greater Boston Chamber of Commerce in endorsing on August 17, 1983, both the construction of a third harbor tunnel and the depression of the Central Artery along lines detailed by the Chamber's Technical Advisory Summary Report, which is enclosed herein. AIM is a statewide organization of manufacturing employers with 2,100 members representing approximately 100,000 employees. We have been active in the development of the state's capital city and particularly its airport is properly a major concern to all of our members. Logan Airport is a vital key to industrial growth in Massachusetts and access to it, both for industrial transportation and for the business travel of the state's business personnel, is essential to the Commonwealth's economic health.

The Central Artery is the route which currently carries the burden of access to the downtown area and the harbor from the portions of the state as well as north/south transit through the heart of the city. It is appropriate for AIM to defer to the Greater Boston Chamber's organizational effort through its distinguished Technical Advisory Committee as the point organization in achieving business consensus among those most directly impacted; and we have participated in portions of its deliberations.

We have been particularly impressed with the diligence of our state's Transportation Department in its planning and plans for the project under consideration. It has been heartening to observe the dedication and seriousness of purpose that the Boston Chamber's Technical Advisory Committee brought to its intensive



... for a more competitive Massachusetts

Mr. Robert J. McDonagh, P.E. -2-

August 19, 1983

study of all aspects of the proposals now before you and the inter-action with the state Transportation Department which is so important now and will continue to be in the future.

Howard Foley, President of the High Tech Council, joins in support of this cooperative endorsement statement of position.

Sincerely,

Walter P. Muther
President

WPM/bb
Enclosure

RESPONSE TO COMMENTS BY ASSOC. INDUSTRIES OF MASS.

No response necessary.



August 1, 1983

66845

Massachusetts Department
of Public Works
100 Nason Street
Boston, Mass. 02114

RE: Proposed Third Harbor Tunnel Project

Gentlemen:

Standex International Corporation owns property at 335 7th Street Extension in South Boston on which it conducts operations through its Harding Company Division. The Division is England's largest supplier of hoisting and rigging equipment. It manufactures rope slings and assemblies, chain assemblies, nylon slings and other hoisting and rigging equipment and supplies for this area.

A substantial portion of the business of Harding involves the immediate repair or replacement of slings, rope and other equipment. The Company is continually receiving requests from its customers for equipment and telephone and other large users of our equipment for an immediate turn-around on repair or replacement. In this time-critical business, a central location is essential.

We wish to go on record as being vehemently opposed to Alternative 3A which would include a third harbor tunnel to the port area located in Commonwealth Plaza. This proposal requires the removal of the existing site of our property and would necessitate relocation of the Harding Company.

Based upon the fact that a relocation would probably mean a less accessible site for Harding which would result in a decrease in the off-the-street business, we wish to go on record as being vehemently opposed to Alternative 3A and ask that your consideration of this objection be placed in the record and taken into account when a final decision is made.

Sincerely yours

Thomas H. DeWitt
Thomas H. DeWitt
Corporate Counsel

RECEIVED

AUG 9 1983

CC: E.J.M.E.
60 First Avenue
Waltham, Mass. 02154

RESPONSE TO COMMENTS BY STANDEX

See responses to comments
numbered 729 and 730.

Wang Laboratories, Inc.
200 Washington Street, Lowell, MA 01851 • TEL. 617-459-5000 FAX 617-459-7614 M 1427

Wang
Lab
Inc.

Wang

August 10, 1983

Mr. Robert Tierney, Commissioner
Massachusetts Department of Public Works
100 Mathua Street
Boston, MA

Dear Commissioner Tierney:

Wang Laboratories supports the recent proposal to construct a third harbor tunnel and to depress the central artery.

The majority of our Massachusetts facilities are located north of Boston. Consequently, we have a strong interest in the transportation system for the efficient and effective conduct of our activities.

Wang Laboratories and the high-technology industry in general depend upon our highways for commuter transportation to and from our various facilities and for shipping materials and products. The proposal before you would remedy what may be the most glaring inadequacy in our present highway system and would immeasurably improve the transportation infrastructure in the Commonwealth.

Moreover, we depend upon Logan Airport for access to other areas of New England, the nation, and the world. If access to Logan Airport is to be improved, construction of the proposed third harbor tunnel should be accompanied by depression of the central artery.

On this basis, we endorse and support the project put forth by Governor Dukakis and his staff. We have signed the attached letter to the Department of Environmental Impact Statement (specifically defined as option 3-a-modified).

Sincerely,

Paul Queri

Paul Queri

WJ:MAC

RESPONSE TO COMMENTS BY WANG LABS

No response necessary.

83 JUL 17 1983
 RECEIVED
 DEPT. OF PUBLIC WORKS

Department of Public Works
 100 Main Street
 Boston, Mass. 02114

1 Longfellow Place, Apt. 2921
 Boston, Massachusetts 02116
 August 10, 1983

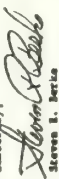
Re: Environmental Impact Statement for a
 Depressed and Widened Central Artery/
 Third Harbor Tunnel Project

Dear Sir:

I am a resident of 1 Longfellow Place Boston, Mass. for seven years and have worked in the vicinity of 40 State Street for the past 13 years. I was involved in public transportation matters during the period 1972 to 1976 at which time I worked actively for the constituent and improvement of mass transportation in the Boston Area. I feel that the Public Transportation Agencies in The State of Massachusetts have improved or expanded mass transportation in the Boston Area. I believe that the Central Artery and Third Harbor Tunnel project is a waste of money and that the money should be used to improve the existing mass transportation system. I believe that the Central Artery and Third Harbor Tunnel project is a waste of money and that the money should be used to improve the existing mass transportation system. I believe that the Central Artery and Third Harbor Tunnel project is a waste of money and that the money should be used to improve the existing mass transportation system.

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As stated above I believe that most of the objections relative to the adverse impacts upon various neighborhoods of the Central Artery and Third Harbor Tunnel project are unfounded. I believe that the project is derived from a good deal of first hand experience as I live within less than 5 minutes walking distance from the North Station, right in the center of this project, (much closer or as close as any of those who I have heard opposing this project) and I feel that it will have no adverse economic or environmental impact upon the area in which I am living. Rather I believe that this project will be good for the neighborhood I live in as well as the rest of the city. I believe that the project will avoid the City of Boston even more than they already do. Without these new businesses and the expansion and retention of the old businesses there will be (1) no jobs for poorer city residents who are in many cases unable financially to travel to the suburbs for jobs (2) there will also not be a sufficient number of better jobs available to serve to attract to the city better educated and more successful individuals of the type that every community needs. I have no doubt that the project will be a success. I have no doubt that the Central Artery/Third Harbor Tunnel EIS and EIR dated July 1983 and I wish to be recorded as being in favor of Alternative 3A as described in this article and for the reasons set forth in this article.

Sincerely,

 Steven R. Berke

RESPONSE TO COMMENTS BY STEVEN R. BERKE
 No response necessary.

Approved:
 Charles C. Gault
 Allen C. Gault
 George Gault

 Comments:
 Anthony J. Ralston

AMMANN & WHITNEY
 CONSULTING ENGINEERS
 48 INMAN STREET - CAMBRIDGE, MASS 02139
 (617) 350-1288
 TELEX 901140

RESPONSE TO COMMENTS BY AMMANN & WHITNEY
 No response necessary.

August 17, 1983

Mr. Robert McDonagh, Chief Engineer
 Massachusetts Department of Public Works
 100 Ashua Street
 Boston, MA 02114

Dear Mr. McDonagh:

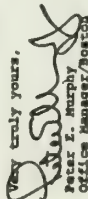
Please allow us to add our total support and
 endorsement to the Central Artery/Third Harbor
 Crossing concept.

We have attended several of the informational
 meetings and we have also reviewed the Draft
 and Supplementary Draft Environmental Impact
 Statements/Reports.

It is our considered opinion that the Department
 proceed with the SA MOD alternative as the sub-
 ject of final environmental analysis and report.

Thank you for the opportunity to comment.

Very truly yours,


 Peter E. Murphy
 Office Manager/Boston

PM/pmc

COMMUNICATIONS SECTION
 AUG 22 1983
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CONSTITUTION
BY-LAWS
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FINANCIAL STATEMENTS
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UNITED BUS OWNERS OF AMERICA
(202) 462-5425 • Suite 201
600 Water Street, S.W., Washington, D.C. 20037-1487

August 10, 1983

Robert J. McDonagh
Chief Engineer
Department of Public Utilities
100 Nashua Street
Boston, Massachusetts 02114

Dear Mr. McDonagh:

Wart to highway safety, United Bus Owners of America (UBOA) believes it is on top of the list of national priorities, the attainment of a comprehensive network of highways of "interstate" status.

We were pleased to learn of the plans of Francis J. Trombly, a member of our Board of Directors, to appear before you, to speak to the importance of tunnel projects pending in Boston.

Although the tunnel concept is present throughout the range of prospective construction, UBOA perceives at least two separate undertakings, between which we are reluctant to name one or the other as the more pressing.

It is exhilarating to contemplate that the Summer/Calahan congestion may be eased by the laying of a third submerged crossing of the Boston inner harbor.

No less stimulating is the thought that the Central Artery, which is I-93 might be changed from challenge to achievement, that this might be accomplished via an imaginative cut-and-cover metamorphosis of the current arterial highway.

UBOA holds to the view that it is not a question of whether operating it is sufficient to maintain the status quo, but whether pending in Boston. Rather, the question is whether we can afford to fail to act.

Wasted fuel, wasted time, losses in each are prodigious. Alienation is no less serious a result. Boston is a major tour destination, but it is becoming less so. Tour operators are beginning to look carefully at the advantages of other cities, and the opportunity to offer special packages to the head of expanding "special fee" portions of their tariffs to offset impairment to revenues when

Robert J. McDonagh
Page Two

operating miles are the standard to be assessed, even though waiting time is more accurately descriptive of bus travel in Boston.

In the short range, costs may appear to be high. In the longer view, the dilemma facing planners such as you is very much the same as a manufacturer who must decide whether plant obsolescence should be tolerated, or whether competitive survival requires hat costs of modernization be budgeted and amortized.

Aesthetics have not been mentioned. UBOA believes it to be unmistakable that the cultural quality of life in Boston will be enhanced if the contemplated tunnel/highway construction is completed. There is no way of assessing a dollar value to the esthetic factor.

In conclusion, Francis J. Trombly spoke for UBOA, as he did when he appeared before you. We are persuaded that the projects, as contemplated, are of paramount importance. UBOA hopes Boston's highway construction plans can be brought to fruition.

Sincerely,


Wayne J. Smith
Executive Director

WJS/ac

RESPONSE TO COMMENTS BY UNITED BUS OWNERS OF AMERICA

No response necessary.



The Gray Line, Inc.

Mr. Robert J. McDonagh
Commissioner
Department of Public Works
100 Mathua Street
Boston, MA 02116

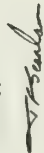
August 16, 1983

Dear Mr. McDonagh:

I am writing on behalf of The Gray Line of Boston, Inc., transportation company. Our services include frequent daily trips to Logan Airport. I appreciate the opportunity to express our sincere appreciation to you and your committee for the third harbor tunnel.

We thank you for your consideration.

Sincerely,


Thomas F. Scanlon
President

TFS/jaa

The Gray Line, Inc. • 100 Baystate Street, Suite 808 • Boston, MA 02116 • (617) 412-7661

RESPONSE TO COMMENTS BY GRAY LINE

No response necessary.



MASSACHUSETTS
AMERICAN AUTOMOBILE ASSOCIATION
1200 REVOLUTION STREET, ROUTE 1, CHESTNUT HILL, MASS. 02157 TEL. (617) 735-0800

August 16, 1983

Mr. Robert J. McDonagh
Chief Engineer
Massachusetts Department of
Public Works
100 Bashua Street
Boston, MA 02116

Dear Mr. McDonagh:

Attached is our statement supporting construction
of the Third Harbor Tunnel and depression of the Central Artery.

Please include this in the record which will be
submitted by the state to the federal officials.

Sincerely yours,

Gerald V. Connelly
Gerald V. Connelly
General Manager

GVC:s
Enclosure

DISTRICT OFFICES

1st DISTRICT OFFICE (AT TOWN OF PLAINFIELD, MASS. 01861)
2nd DISTRICT OFFICE (AT TOWN OF PLAINFIELD, MASS. 01861)
3rd DISTRICT OFFICE (AT TOWN OF PLAINFIELD, MASS. 01861)
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9th DISTRICT OFFICE (AT TOWN OF PLAINFIELD, MASS. 01861)
10th DISTRICT OFFICE (AT TOWN OF PLAINFIELD, MASS. 01861)

STATEMENT OF AAA MASSACHUSETTS
IN SUPPORT OF CONSTRUCTION OF
THIRD HARBOR TUNNEL
AND DEPRESSION OF CENTRAL ARTERY

AAA Massachusetts strongly supports the state proposal to construct a Third
Harbor Tunnel and to depress the Central Artery.

We support the tunnel proposal which is known as the Seaport Alignment route
from the Central Artery - Massachusetts Turnpike interchange across Fort
Prest Channel and Boston Harbor into airport property, thereby bypassing any
residential and business areas and not disrupting any East Boston
neighborhood.

In taking this position we speak not only for the 311,000 AAA members in
Massachusetts and the 1,340,000 AAA members in New England, but also for all
motorists. All citizens will benefit greatly by easier access to Logan
airport and by relief from traffic congestion in Boston, which is the
business, transportation, governmental and service center for the entire New
England region.

AAA Massachusetts has been advised by the Federal Highway Administration
that the Third Harbor Tunnel and the depressed Central Artery will be
considered by the federal government as two separate projects and that
funding for one is not dependent on funding for the other.

Our support of these two projects is made with the qualification that there
will not be any transfer of the federal funds available for the Tunnel to
other highway and public mass transit projects.

Gerald V. Connelly
AAA Massachusetts
1200 Revolution Street
Chestnut Hill, MA 02167

August 16, 1983

RESPONSE TO COMMENTS BY AAA

No response necessary.

AD HOC COMMITTEE FOR A SAFE BOSTON HARBOR
c/o 2161 Mass Avenue, Cambridge, MA 02140 • 661-0120



August 23, 1983

Robert J. McDonagh
Chief, Engineer
Massachusetts Department of Public Works
100 Nassau Street
Boston, Massachusetts 02114

SUBJECT: COMMENT ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
SUPPLEMENT - DEEPSEAED CENTRAL BATTERY AND POSSIBLE
HARBOR TUNNEL, BOSTON, MASSACHUSETTS.

Dear Mr. McDonagh,

The Ad Hoc Committee for a Safe Boston Harbor is a coalition of nuclear freeze organizations from the Boston area and other groups who favor a nuclear freeze who have gathered to oppose the U. S. Navy's stationing of nuclear missiles on ships based in Boston Harbor. Although the U. S. Navy decided not to station the Battleship Iowa and several large missile firing ships in July 1983, we currently are aware of proposals by the Navy of stationing such ships in Boston, although these are not final.

COMMENT

We note the DEIS of July 1983 does not include the U. S. Navy as an "Other Significant Government Action in the Area" (Page 111). The current Navy Plan is to station two submarines with SSBNs (Strategic Ballistic Nuclear Missiles) in the Atlantic Ocean, which could be stationed in nuclear warheads of one million explosive tonnage. We believe it in the public safety interest to have transportation routes as far as possible from such weapons. Hence the "Alternative 5a" would be less favorable from this standpoint from "Alternative 3a" as shown in the DEIS Supplement.

Thank you for the opportunity to comment.

Respectfully Submitted,

John F. Stewart
John F. Stewart
Environment & Safety Committee

RESPONSE TO COMMENTS BY AD HOC COMMITTEE FOR A SAFE BOSTON HARBOR

No response necessary.

RESPONSE TO COMMENTS BY FERDINANDO CARANGELO

No response necessary.

382 North Street
Boston, Massachusetts 02113
August 22, 1983

Robert J. McDonagh
Chief Engineer
Massachusetts Department of
Public Works
100 Nashua Street
Boston, Massachusetts 02114

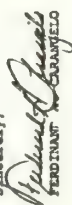
Dear Chief McDonagh:

As a life-long resident and community leader of the North End section of the City of Boston, I hereby submit to you my support of the depression of the Central Artery project. I also support the benefits to the community as described in the summary paper which was distributed to the North End residents on August 3, 1983.

I also would like to be involved in any committee dealing with the air rights above the tunnel and the distribution-thereof.

Thank you for your attention to this request.

Sincerely,


FERDINANDO CARANGELO

August 2, 1983

Mr. Robert J. McDonough
Chief Engineer
Massachusetts Department of Public Works
100 Nashua Street
Boston, Massachusetts 02114

Re: Third Harbor Tunnel/Depression of Artery/
Environmental Impact Statement/Report

Gentlemen:

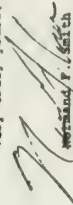
The Waterfront Neighborhood Association has the following comments on the draft Environmental Impact Statement on the above-referenced project:

1. The primary impacts will be the obstruction of motor vehicle and pedestrian traffic from the North End waterfront area to the Government Center Area. The draft Environmental Impact Statement does not deal with this problem or a solution thereto. (374)
2. The draft Environmental Impact Statement does not deal with the impact of the opening of the depressed artery and the third harbor tunnel on the adjacent residential areas. (375)
3. It is not clear from the Environmental Impact Statement the route by which fill will be removed and construction materials brought in to the various points along the construction route. (376)
4. It is not clear from the draft Environmental Impact Statement when construction will begin in the morning and when construction activities will end in the evening. (377)
5. It is not clear from the draft Environmental Impact Statement at what points during construction it will be required to divert traffic and the routes on which this traffic will be diverted. (378)

August 2, 1983
Page Two

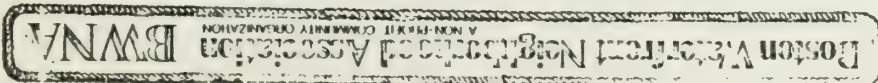
The Boston Waterfront Neighborhood Association would appreciate these problems being addressed in detail in the final Environmental Impact Statement.

Very truly yours,


Bernard V. Smith
President

BWNA
63 Atlantic Avenue
Boston, Massachusetts 02110
(617) 436-8900

HRS/mdg



RESPONSE TO COMMENTS BY THE BOSTON WATERFRONT NEIGHBORHOOD ASSOCIATION
(August 2, 1983)

374. Upon completion of the Preferred Alternative, vehicular and pedestrian circulation between the North End/Waterfront and Government Center, across the Central Artery will improve; see Section 4.4.4 Joint Development, Section 4.5 NEIGHBORHOOD AND COMMUNITY FACILITIES IMPACTS, and Section 4.16 AESTHETIC IMPACTS. During construction, existing pedestrian crossings will be maintained.

375. Ventilation building impacts are addressed in Section 4.7.5 Effects of Ventilation Building Emissions. The ventilation building impact assessment focuses on one-hour NO₂ and one-hour and eight-hour CO concentrations. No violation of CO concentrations are anticipated. For the Preferred Alternative, anticipated maximum one-hour NO₂ concentrations will not exceed the State's policy level of 320 micrograms per cubic meter at any of the 34 neighborhood locations evaluated. However, if a sensitive receptor is located very close (less than 300 feet) to the ventilation building, the potential for exceeding the State's policy level may exist as indicated in Section 4.7.5. As noted in the FEIS/FEIR, conformance with this policy level is required, and the final siting of the ventilation buildings will require additional air quality analysis. The FEIS/FEIR proposes that the ventilation building locations identified in the analysis be subjected to additional air quality analysis and refinement of the ventilation system design. Initial analysis indicates conformance with the State's NO₂ policy level can be achieved by a combination of measures identified in Section 4.7.5.

376. A haul road will be established within the right-of-way (under the elevated Central Artery) for the purpose of transporting materials to and from the construction site. Heavy construction vehicles will be restricted to the haul road in this area. Some of the construction traffic will of necessity travel on city streets, but traffic management measures will be instituted to minimize use of local residential streets as discussed in Section 4.1 of the FEIS/FEIR.

377. Construction time may vary by area depending on the sensitivity of abutting land uses. Potential mitigation techniques for construction noise include limiting noisy construction activity to daytime hours near noise sensitive areas and ensuring that all diesel powered equipment has effective mufflers. The feasibility and effectiveness of these mitigation measures depends upon the specific construction equipment and scenarios planned for the project. Therefore, a project-specific plan to mitigate construction noise will be developed during the design phase (see Section 4.8.1 Noise). Two 10-hour shifts are anticipated for construction to meet the time periods noted in the FEIS/FEIR, although the noisy construction will be restricted.

378. Stage construction sequencing of the project has been prepared at a preliminary level to provide a guide for evaluating environmental impacts. However, due to the magnitude of the project, specific times and locations of traffic diversions cannot be determined as part of the FEIS/FEIR process. Section 4.1.2 Construction Sequencing and the stage construction portion of the Supportive Engineering Report present information known to date. The Commonwealth will prepare further environmental documentation regarding construction impact issues, including traffic diversions, as design work progresses.

SIERRA CLUB • New England Chapter

3 JOY STREET, ROOM 12, BOSTON, MASSACHUSETTS 02108 • 617-257-4335

August 28, 1983

GREATER BOSTON GROUP COMMENTS ON THE DEPRESSION OF
THE CENTRAL ARTERY AND THIRD HARBOR TUNNEL DEIR/DEIS

The Greater Boston Group of the Sierra Club welcomes this opportunity to comment on the Draft Environmental Impact Statement and Supplement to that statement (DEIR/DEIS) on the Third Harbor Tunnel, and Interstate 98/Central Artery, Interstate 93. It is indeed a formidable document covering the largest highway project ever proposed in the Commonwealth. The Sierra Club hopes that the planners and engineers in the Massachusetts Department of Public Works (DPW) will consider carefully the comments and criticisms we have submitted and that has the potential for affecting millions of people daily.

Historically, the Sierra Club has supported the depression of the Central Artery. We do have strong reservations concerning the overall planning objectives and the surface developments in particular. The plans for the surface developments as shown in the DEIR/DEIS are not acceptable. The Sierra Club has felt that streetwidening options to build had been forwarded and no coherent plan for Logan Airport development had occurred. Our sentiments have not been changed by the DEIR/DEIS. Some of our reasons follow.

Overall, the DEIR/DEIS indicates a number of positive benefits for the city. From the Sierra Club perspective, the most important opportunity is that the Central Artery is a project that have resisted building the Central Artery through the city's neighborhoods in the 1950s. Done correctly, a depressed Central Artery can be used to visually and physically unite the city without the elevated highway, noise can be reduced and air pollution channelled.

However, because of a lack of overall state policy objectives the study presents a poorly executed design for Boston's future.

Where are the transportation-land use planning objectives developed by the state planning office of the first Dukakis administration? Where is that sense of overall vision of making better cities and towns to live in? Instead we have planning of isolated projects by short-sighted highway engineering criteria.

Look at figure 181 (Joint Development Opportunities) of the current DEIR/DEIS. This is the same slash through our city that was gouged by the original "engineers" and "planners" in the 1950s? And look at the thoughtless and unnecessary taking of the Fort Point Channel - an open space of incalculable future value for the expanding financial district.

for the expanding financial district.

A cloverleaf mentality (see DEIR/DEIS page xi "new surface arterial") will ease Boston a corridor city as opposed to a core city. All this technical sleight of hand is intended to mask the opportunity for a new surface arterial (Waltham-to-the-Sea, etc.) and development parcels (along State St., etc.) that bridge the proposed depression and that have priority over high speed arterials at the surface (not-withstanding promises of a narrower roadway with pedestrian traffic lights and cobble stone crossings). Such poor design cannot be tolerated. It is potentially as bad or worse than the present facility.

SURFACE ARTERY

The fourth largest road system in the project area is referred to as the "Surface Artery". However, the discussion of the impacts of this development is very limited.

If the preparers of this report had included the "Surface Artery" as one of the arterial links of this project area, there would be a description under section 2 of a considerable discussion under the heading "Surface Arteries" and a discussion of the "Surface Arteries" consequences found and discussed in section 4, "Environmental Consequences". Lacking these details, the DEIR/DEIS is incomplete and should not be accepted.

For example, the first reference to a surface artery is Figure 69 (map for alternative 1A) where two small legends point to certain spots on this map. Also, Figure 71 and Figure 72, which show the "Surface Artery" as a continuous "collector-distributor" street running from Kneeland Street to Causeway Street. Many other arguments on this page point to adverse environmental impacts that would apply exactly to a "Surface Artery", but are meant to apply to the stated widening option).

Another example is page 38, paragraph 1.1.1 which describes with aptitude the "Surface Artery" as a "collector-distributor" street with "uninterrupted traffic flow" and "uninterrupted traffic flow" at 188 locations considered to be affected by the project. This includes the existing and proposed Central Artery/Seaport Access Road/Third Harbor Tunnel for all alternatives. There is no consideration under any title of "Surface Artery" (or any other name) except for Table 56, Intersection 55 as a sub-component.

SURFACE DEVELOPMENTS

There is concern that the reconstructed surface area will continue to be designed based on a street, the new surface arterial. The parcels depicted in Figure 181 indicate this. Does Boston need a new continuous surface roadway? There must be such more discussion by citizens, and then land use planning of the entire corridor, and only then a determination of the configurations and uses for the parcels and roadways. The design should hinder vehicles moving between the surface roadway and the

depressed artery. This planning and design aspect to the project must be done simultaneously with the continued planning of the depression project. This is especially true since additional footings for higher buildings over the depressed artery must be constructed as the tunnel is being built.

No mention is made of when decisions on the new surface structures will be made. Will they be made before the tunnel is built? Will the Federal Government? The Commonwealth? The anticipated developers? How tall will the new buildings be and how many of them will be built? These questions should be addressed now so citizens will have an opportunity to picture the final product of a depressed artery.

Descriptions of the various neighborhoods and city sections do not appear to be included in the study. The goal should be to encourage mixed-use diverse communities including mixed income and mixed racial residential areas. The waterfront is not now all luxury apartments and Quincy Market retail, nor should it become so in the future. The analyses of neighborhoods is too simplistic; diversity should be encouraged.

Inadequate study has been given to the recreational and open space needs of the city. How can the project fill the gaps? It is not sufficient to add a little landscaped open space where convenient. Parks are a real urban environmental need that must be met.

Inadequate study has been given to the pedestrian needs of the area. Pedestrian habits and numbers must be studied. The space needed for people to enjoy the city can be included.

Too much weight has been given to parking lot uses. Is this a rational land use choice in Boston where we have a parking freeze and limited land? Was a survey of alternative choices such as existing garage facilities been done? Is it the City of Boston's policy to encourage computer parking lots?

The Sierra Club strongly encourages that provisions for citizen involvement in planning of the surface development be included in the final EIR. A goal of this project should be discouraging use of private cars in the downtown area. This can be profoundly affected by the design of the surface roadway. There is no point to depressing the Central Artery if the end result will be surface conditions that still divide the city, hinder pedestrian traffic, and add no additional recreational areas.

MARINE USES

The salt water harbor and uses of marine transportation have been virtually ignored in the DEIR/DEIS. No attempt has been made to apply CM water-related, water-dependent criteria to any of the land uses. The waterfront is the central transportation terminal for commuter boats, ferries to the Boston Harbor Islands Park and

Projected passenger ferries all around the harbor, as well as recreational boating and entertainment cruises. The harbor is also the center of commercial marine transportation in the state. The waterfront is an important economic asset to the state. In addition, many of these marine activities are historically significant.

It is hoped that the Central Artery Project could bring better coordination between the MDC Charles River basin plans and the other development plans in the adjacent areas. The Sierra Club is concerned that the project will not take into account the needs of the waterfront. Pedestrian access and walkways must be a priority in this area, and all modifications which could make the new bridges more attractive and reduce shadows should be implemented.

HISTORIC IMPACTS

The description of the historic aspects of the project were all-inclusive and excellent. There was, however, very little on an historic city not made to accommodate automobiles and trucks. That's what has created the ambience that makes Boston commercially and financially desirable. That is the quality of life that attracts business. To create easy access for cars - roadways and parking - would destroy the ambience that has made Boston successful.

For example, Fort Point Channel is eligible for the National Historic Register. It is inviolable, and should not be touched. The highway should be underground at the head of the Channel, and also depressed under Old Dorchester Avenue. There is no convincing need for a New Dorchester Avenue, for locating a tunnel in the Channel, nor for a new Northern Avenue bridge. All the bridges over the Channel should be put in decent condition so the Channel will be navigable as it always has been historically.

As the project area includes some of the oldest sections of Boston, the archaeological findings are going to be impressive and numerous. Advance commitment should be made for preserving these sites and publishing their implications. This material will be tremendously exciting for all citizens of the United States.

CHARLESTOWN

With the depression of the Central Artery there is a most beneficial visual improvement to the connection between Charlestown and the downtown districts of Boston. However, this is created at the expense of worsening the impact on the Charles River water passage and the potential pedestrian walkway on each bank. The width of the bridges with their ramp connections, the clearances underneath the river crossing, the design of the approach to the bridges, and the design of the approach to the river corridor is to be saved.

On the Charlestown side of the river the roadway with its long upgrade and greater noise impact is relocated substantially closer to the Town Hill residential community. This too, needs to be changed. The project needs to be redesigned so that there is no loss of parking (MHC) and the existing viaduct. The height of the bridges has to be reconsidered and the Scoville Drive connectors arranged so that all the open space areas are pleasant and useable.

WATER QUALITY
The artery project conflicts geographically with two proposals that are essential and would add to Boston beaches. These two projects are: the MDC Combined Sewer Overflow facility planned for the head of the Fort Point Channel and the West Side Interceptor at Atlantic Avenue. Both projects should be completed as a prerequisite to any Central Artery construction. At times the raw sewage from all downtown is presently running into the harbor and this project will obstruct its correction at a later date.

Construction of the Third Harbor Tunnel in the harbor must avoid polluting the water with sediments in the same way that other projects have in the past. Proper disposal of the very polluted silt material is an important issue. The top two feet of this sediment must be disposed of in a monitored sanitary landfill. The location of the disposal site should be addressed. Ocean dumping of the silt material is assumed by a liability to the cost of the actual material to be dredged and disposed of.

The Sierra Club notes that any dredging should not take place between February and May to protect the fish populations during their most susceptible time.

AIR QUALITY
The effects on air quality of a depressed Central Artery and the Third Harbor Tunnel are carefully treated in this document. On first glance, the DEIR/DEIS suggests that improvements in the air quality will result from all of the construction alternatives. These claims rest primarily on the decreased emissions from individual cars under the Federal Motor Vehicle Control Program (FMVCP) and reduced queues on the artery. However, in examining Table 87, the emissions for carbon monoxide (CO), all nitrogen oxides (NOx) and non-methane hydrocarbons (NMHC) will all increase under Alternative 6. Emissions for these pollutants are estimated to decrease substantially from their 1982 levels. However there will not be any improvement in air quality solely as a result of a depressed Central Artery.

For example, hydrocarbon emissions are expected to increase 13% under Alternative 3A and 19% under Alternative 5A. Compared to the no-build situation, in the year 2018, Alternative 6 is the

only situation that shows hydrocarbon improvements over the no-build alternative. The increase in MHC are attributed to increased vehicle miles traveled (VMT) on the artery. Compare Pull to DEIR/DEIS. The DEIR/DEIS is not correct on this point. Compare Pull to DEIR/DEIS. The levels of MHC will be dropping significantly from their 1982 levels (approximately 58%). However, this improvement in air quality should not be touted as a reason to build these projects when the emission levels would be dropping for reasons other than the artery, mainly the FMVCP.

The DEIR/DEIS sections that any increases in MHC must be offset with other areas from the Massachusetts Transportation Improvement Program to satisfy the requirements of the EPA approved State Implementation Plan. Yet the DEIR/DEIS never mentions how these offsets will be achieved. Massachusetts is not attaining for CO and ozone. Ozone is affected dramatically by MHC which is why the inspection and maintenance program was implemented this April. What further measures can be proposed to offset the MHC increases? This must be addressed.

Total CO levels will not change significantly for any of the proposed alternatives. Carbon monoxide will continue to be a serious problem in E. Boston without a third tunnel, and with continuing traffic congestion. Again, it is important to realize that any air quality improvements will result from less congestion, not fewer cars, or control measures.

Nitrogen oxide emissions are expected to increase with all alternatives. This is because NOx emissions increase with speed (the reverse is true for CO and MHC whose levels improve with better dispersion at high speeds.) No mention is made of controlling other NOx sources to offset these increases at sites where modeling predicts emissions in excess of the state policy level.

Ventilation buildings must be carefully designed to avoid hotspots of NOx and CO.

Real time modeling of CO should be mandatory in the tunnels to ensure that levels are kept as low as possible.

SEAPORT ACCESS

The project for a Seaport Access road has its good points but there is insufficient data in the DEIR/DEIS to evaluate it. Here the supporting evidence is incomplete. Its stated purpose is to remove the majority of through traffic from South Boston streets. The Sierra Club is not certain it will fulfill its purpose. When the access road reaches its vehicle capacity trucks can be expected to resort to neighborhood streets to shorten their trip time. Trucks use of the Seaport Access road must be mandated. Trucks should be restricted to the Seaport Access road and through-traffic should make clear how the use of this road could help ease downtown traffic.

TUNNEL ALTERNATIVES

Traditionally, the Sierra Club has opposed a Third Harbor Tunnel. Our primary reason stems from the fact that the tunnel would have the impact of an ever-expanding Logan Airport. While we recognize the potential benefits of diverting airport traffic off of the Central Artery, we fail to see how this traffic can be controlled once it arrives at an airport with limited parking. If the greatly expanding commercial traffic is considered, it appears that the Third Harbor Tunnel will only serve to increase traffic to the airport and lead to increased air and noise pollution.

Why is the use of our other regional airports, like Worcester or Bedford, not considered for diverting some of the commercial traffic going to Logan? There is an overwhelming need to set up a regional (Massachusetts or New England) air and surface transport board to coordinate the use of our airports and major business hubs. Such a board could ensure that New England products distributed throughout New England are distributed throughout the region. Citizen participation is a must on such a board.

The Sierra Club will continue to oppose a Third Harbor Tunnel and, overall, support of Logan Airport is considered and other alternatives developed. Not the least of these alternatives is public transit.

PUBLIC TRANSIT

The planning of the combined Expressway-Tunnel project is fatally flawed by the total absence of any analysis of possible new public transportation access to Logan Airport, not of any capacity of the proposed transportation use of the expanded transportation includes the use of private bus companies, limousine services, etc., that are available to the public and reduce the number of automobiles on the roads. It is the position of the Sierra Club that unless and until such planning is included, we are opposed to a Third Harbor Tunnel.

In the entire DEIS for this massive project not one word is to be found about public transportation. The DEIS does not even mention impacts on the rapid transit lines within the project corridor. The name of the MBTA, does not even appear among the list of cooperating agencies on the first page of the supplement to the DEIS.

The Sierra Club has participated actively in transportation planning in the area since the process was opened more than a decade ago by Governor Sargent. We have been involved in the biggest project ever to be proposed in the Commonwealth; a plan that will cost an estimated \$2.2 billion in 1982 dollars, and for the first time in our experience public transportation is not mentioned. There is not even the standard hypocritical

allusion to "exclusive bus lanes."

Exclusive bus lanes, in fact, are just the opportunity that has been overlooked in the planning of this project. The MBTA runs a great many express buses to various destinations, notably west and north of Boston. The buses from the west all terminate at Downtown Crossing, with good access to the South Station area, but not convenient to Government Center or the new-developing North Station area. The buses from the north terminate at Government Center, with good access to the South Station area. And none of them provide convenient access to Logan Airport. These terminals are chosen because downtown traffic congestion is such that the advantages of express bus service would be lost if the buses were forced to traverse the streets in making the connection.

The project before us proposes a substantial increase in capacity of the Central Artery and a doubling of the cross-harbor capacity to East Boston and Logan Airport. It is the Sierra Club's position that some of this increased capacity must be devoted to improved public transportation.

The public transportation element need not be limited to buses. The report makes no mention of a possible rapid transit line from Government Center to the new harbor crossing using the existing blue line tunnel. The new crossing could be built, limited to express buses from the existing blue line to the airport, but a connection to either the red or green line that can be used as access to a satellite terminal located on Route 128. The feasibility of such a plan has never been formally explored to our knowledge.

CONCLUSION

The Sierra Club commands Secretary Salvucci and his staff at the DEIS for compiling such an extensive document that covers many areas of concern in this development of the Central Artery and the Third Harbor Tunnel. However, even in its depth the DEIS/DEIS fails in many areas. Most notably, the DEIS/DEIS lacks

coherent planning policies. The potential for surface developments above the artery are inadequately addressed, or ignored. And the options explored in connection with the tunnel show very little creativity.

Those responsible at the DPW must broaden their policy objectives to genuinely integrate other design disciplines and not merely adequate budgets for urban design, landscaping, joint development, and participation by city planning and urban design departments be built into these projects at the earliest stages (the DEIR/DEIS not-with-standing, p.xvii.) Otherwise we shall be doomed to mediocre plans in spite of the billions to be spent.

To maintain minimum standards for the proposed projects

- 1) Urban design control of the highway engineering proposals.
- 2) Design control of the streetscapes and open spaces.

This can be accomplished by including professionals from outside the DPW. In addition, citizens should continue to be part of all planning stages and be able to choose professionals to help them with their review. Of course, budgets must be included for these groups.

It is imperative with a project of this size that public participation continue to be a major force for change. The Sierra Club is encouraged by Secretary Salvucci's efforts so far in working with citizen's groups. We look forward to continuing our dialogue as the planning for the Central Artery and Third Street moves on in any format. Thank you for this opportunity to comment.

Submitted by: Garry Ives, Elizabeth Johnson, William Lamb, John Lewis, Louise Lewis, Ernest Lovenstein, Jeffrey Morgan, and Nancy Seidman for the Greater Boston Group of the Sierra Club.

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179. The SDEIS/DEIR and PEIS/PEIR recognize the importance of the Surface Artery. Traffic volumes are analyzed in a number of locations, as are construction impacts and other traffic issues. See Section 4.2 TRANSPORTATION. The Surface Artery will have frequent traffic lights and on-street parking and will carry comparable volumes to the city streets it replaces. Its appearance and land use implications are discussed in Section 4.4.4 Joint Development and Section 4.16 AESTHETIC IMPACTS.

180. See response to comment 379. The Commonwealth recognizes the importance of planning for new joint development parcels and is committed to an ongoing open participatory process which would expand on the FIS procedures. In consultation with the City of Boston, the Commonwealth will work to ensure the adherence to sensitive development controls for air-rights development, and the participation by neighborhood residents and others in the planning process for such development. See Section 4.4.4 Joint Development for a detailed description of the process and the pertinent issues, including further analysis of the parcels by subarea.

181. Existing recreational and open space facilities are discussed in Section 3.1 NEIGHBORHOOD CHARACTERISTICS AND COMMUNITY FACILITIES. Impacts on these facilities, both positive and negative, are detailed in Section 4.5, and in Sections 5.1 PARKLANDS and Section 5.2 HISTORICAL RESOURCES of the SECTION 4(f) EVALUATION. The project opens new parcels, some of which will be used for open space, and recommends landscaping improvements, specifically in the Port Point Channel area and along the Central Artery corridor (see Sections 4.4.4 Joint Development and Section 4.16 AESTHETIC IMPACTS for a discussion of potential uses). Extensive study has been performed for the project, but much remains to be done to be sure the future development is consistent with the needs of the community.

182. Pedestrian access will be maintained throughout the project area during the construction period. After the construction period, pedestrian access will be improved as a result of the removal of the elevated Central Artery structure, and the provision of pedestrian crossings (see Section 4.16 AESTHETIC IMPACTS). The pedestrian environment will be given particular attention in additional planning for air rights parcels (see Section 4.4.4 Joint Development). New opportunities for pedestrian access in Port Point Channel are provided by the Preferred Alternative.

183. Discussion of the replacement of displaced parking spaces is included to mitigate residential, land use, and economic impacts on neighborhood residents and businesses. Many of the replacement parking options identified, however, could involve use of existing garage facilities. It should also be noted that the number of vehicle trips to downtown in the Preferred Alternative trip table was forecast to be the same number as was forecast for the No-Build trip table (see Section 1.3). Based on present trends of office construction and present trends of creation of new parking spaces (which is allowed by conditions of the current freeze), it would seem that the supply of parking may be actually lower than that assumed in the design year (2010) forecasts.

184. Citizen input will continue to be solicited throughout the design phases of this project, an important component of joint development planning during design of the project: see Section 4.4.4 Joint Development of the PEIS/PEIR. Joint development design incorporated into the Surface Artery will include considerations of pedestrian traffic and recreational areas. The pedestrian environment in downtown Boston will be significantly improved with construction of the Preferred Alternative.

185. The project has no adverse effect on water transportation or water-related and water-dependent land uses. For example, in the long term, pedestrian access to the water's edge (along the outer edge of the tunnel box) along Fort Point Channel, will actually enhance the development potential of water-related uses such as marinas and outdoor restaurants. See Section 4.4.3 Preferred Alternative for land use impacts.

186. The MDPW and BORTC are working to facilitate and coordinate with both MDC and Boston Redevelopment Authority plans in the Charles River Basin Area (see Section 4.4). As indicated in the FHS/FEIR, the BPA has a major urban renewal project proposed for this area; the BPA's plans are also in conflict with the plans of the MDC. A continuing effort to improve the bridge design, maximize pedestrian access, and minimize disruptions in this area will be maintained throughout later design phases of this project (see Section 5.1.3 Charles River Basin Reservation). It is agreed that conflicts between the agency proposals have to be resolved before the impacts of the Preferred Alternative can be firmly established and final mitigation measures incorporated into the project. Preservation of the opportunity for pleasant pedestrian access to the Charles River's banks and its recreational values will be a major objective in the development of a single plan for the area.

187. The Preferred Alternative incorporates the least disruptive design for a tunnel in the Fort Point Channel District. Section 5.2.3 Fort Point Channel District details the other alternatives examined and the need for a tunnel in that area, to achieve the desired level of service improvements on the Central Artery. An extensive planning and design effort has been undertaken with the appropriate historic preservation agencies to minimize impacts of the project on the historical and archaeological resources of the area. The results of this effort are documented in the Section 106 Memorandum of Agreement. With the Preferred Alternative, the northbound Central Artery tunnel section will, for the most part, be located below Channel bottom elevations. The Seaport Access Alignment tunnel is also well below water as it crosses the southern portion of the Channel, thus minimizing any impacts to the Channel. The relocated Dorchester Avenue has been reduced from a four-lane cross-section to a one-way, two-lane northbound roadway with the Preferred Alternative. During the evaluation of all alternatives, analysis of transportation benefits showed that at a minimum, a northbound Dorchester Avenue was needed to replace the northbound access to the Atlantic Avenue/Northern Avenue area presently provided from the northbound Dewey Square Tunnel. The new Northern Avenue Bridge is presently being reviewed by the Department in another on-going but separate study and design process. Consistent with the Section 106 Memorandum of Agreement, the project will minimize archaeological impacts by avoidance, preservation in place, or recovery of data. See Section 5.3 ARCHAEOLOGICAL SITES. This commitment is part of an agreement signed by the Boston Landmarks Commission, the Massachusetts Historical Commission, MDPW, FHWA, and the Advisory Council on Historic Preservation.

188. As a measure to mitigate Section 4(f) impacts on Paul Revere Landing Park, BORTC and MDPW will continue to work closely with the MDC and BPA to facilitate land acquisition on the Charlestown side of the river; preservation of access to recreational values of the Charles River Basin will be a major objective in development of a single plan for the area, and suitable remnants of parcels acquired for right-of-way for the Central Artery development project and the related North Area Project will be made available for park use. See Section 5.1.4 Paul Revere Landing Park and 5.1.3 Charles River Basin Reservation. The BPA's existing bascule bridge (Draw 1) also inhibits development of the pedestrian walkway along the banks of the river.

189. The Preferred Alternative was designed to accommodate construction at a later date of both the MDC's Combined Sewer Overflow Facility in South Bay and the Boston Water and Sewer Commission's West Side Interceptor. BORTC and MDPW support undertaking these projects in conjunction with Central Artery/Third Harbor Tunnel construction, and are working with relevant State and Federal agencies to seek to increase the priority of the CSO plant for implementation.

190. The location of a disposal site for dredged material has been carefully studied and is discussed in Section 4.1.3 DREDGED AND EXCAVATED MATERIAL DISPOSAL. As indicated in Section 4.1.3, additional biological testing of the sediments of the Preferred Alternative's cross-harbor alignment will be done during design. It is anticipated that dredge material from construction of the Third Harbor Tunnel would be disposed of by ocean disposal at the Massachusetts Bay Foul Area. Sanitary landfills have been identified as possible disposal areas for other, cleaner excavated clay material. The restrictions on the dredging program will be determined by the permitting processes of the U.S. Army Corps of Engineers, the Massachusetts Department of Environmental Quality Engineering, and the Boston Conservation Commission.

191. The air quality effects for a project of this significance and scope have many ramifications. These include emissions burden, one- and eight-hour CO concentrations, toll plaza impacts, air quality in the tunnels, CO and NO_x impacts from ventilation buildings, and construction impact. The SDIS/SEIR examines each of these equally important aspects individually and in aggregate.

From an emissions standpoint, it is true that by far the greatest reduction of CO, NO_x, and NMHC emissions will be achieved by the Federal Motor Vehicle Control Program. This reduction will be realized independent of project alternatives. The positive effects (i.e., improving air quality) of the depression of the Central Artery and/or the new harbor tunnel crossing are felt primarily in the dramatic elimination of potential 8-hour CO standard violations at many locations in the study area - violations that are anticipated with the No-Build Alternative.

With the exception of Alternative 6, NMHC emissions for all other build alternatives were estimated to be slightly higher than the corresponding No-Build Alternative emissions in 1990. VMT within a smaller network that is more focused on the Central Artery corridor (as was used in the Air Quality analysis for this project) was estimated to show a small increase. This is because with the improvement in capacity on the Central Artery, more traffic will remain on the Central Artery resulting in higher VMT in this particular corridor. By 2010, however, the improvement in travel speed (VS the increasing congestion with the No-Build Alternative) will result in reduced NMHC emissions that will offset the small VMT differences, such that for some alternatives (e.g., the 5A Modified) NMHC emissions were estimated to be less than the corresponding No-Build emissions.

NMHC emissions for Alternative 6 were estimated to be lower than the corresponding No-Build emissions in both 1990 and 2010. For the Preferred Alternative and the Two-Lane Tunnel Option, the NMHC emissions were estimated to be slightly higher than the No-Build emissions in 1990, and less than the No-Build emissions in 2010. All other build alternatives were estimated to have higher NMHC emissions than the No-Build emissions. However, as shown in response to comment No. 180, these relatively higher emissions for build alternatives are attributed to the more limiting traffic volume.

In the air quality analysis. This more focused network would tend to emphasize the fact that with the improvement in the Central Artery (associated with the depression of the Central Artery or the new cross-harbor tunnel or both) more traffic will remain on the Central Artery resulting in higher VMT in this limited network.

Excessive 8-hour CO concentrations are anticipated in East Boston in the vicinity of the existing tunnel portals with the No-Build Alternative. As noted in the comment, the improvements in the air quality is due to significant reduction in traffic congestion associated with the alternatives with a new tunnel. By channeling a large proportion of the cross-harbor traffic to the new tunnel, the demand for the Sumner and Callahan Tunnels is reduced. Lower demand volumes will lead to lower delay times (e.g., less congestion) and therefore less emissions.

The State's project-level criteria for consistency determination with the State Implementation Plan do not apply to NO_x emissions from mobile (transportation) sources. Nor do the criteria require any control measures for an alternative whose NO_x emissions were estimated to be higher than the corresponding No-Build emissions. However, the State's policy level governing maximum one-hour NO₂ concentration will be applicable. The only sources of emissions that are found to be problematic with respect to this policy level are the ventilation buildings. Section 4.7.5 Effects Of Ventilation Building Emissions of the FEIS/FEIR addresses this potential impact in detail and identifies mitigating measures that are promising. From the magnitude of the estimated impact, it would appear that by using these mitigating measures - either individually or in some combination - the State's policy level can be met at every receptor examined. The feasibility and effectiveness of these measures will be investigated in detail during the design stage. It is important to note that in many instances, existing NO₂ concentrations also exceed the policy level.

Potential NO₂ hotspots (i.e., receptor locations with one-hour NO₂ concentrations that might exceed the State's policy level) will be avoided or alleviated by more detailed investigation of the mitigating measures during project design stage. Following the submission of the SPDS/SPER, additional detailed analysis of CO impact from ventilation buildings was conducted. The results, as reported in the FEIS/FEIR, indicate that CO emissions from the ventilation buildings do not represent a problem when measured against the contributions from the other mobile sources or the applicable one- and eight-hour CO standards. These results have been discussed with the air quality specialists of the EPA and DEQ.

CO levels in the various tunnels will be monitored on a real-time basis. Although no air quality problems are anticipated in the tunnels under normal operating conditions, unexpected emergencies (e.g., fire in the tunnel, or mechanical ventilation system malfunctioning) could happen. Section 4.7.1 Concentrations in the Tunnels of FEIS/FEIR supports the development of contingency measures to avoid potentially serious hazards. These measures will be developed in detail during project design stage.

392. The FEIS/FEIR contains detailed information about the traffic benefits of the Seaport Access Alignment tunnel; see Section 4.2.2 Traffic Volumes for a discussion of the reduced general traffic and truck traffic on South Boston local streets.

393. Traffic to Logan Airport is expected to continue to increase with or without this project. Failure to deal with problems of automobile access contributes directly to the worsening of affected neighborhood environments, such as traffic detouring to local streets when airport ramps are congested. This serious neighborhood problem will be alleviated by providing direct regional expressway access. In addition, the Preferred Alternative has provided the opportunity for the inclusion of an ambitious program for a Downtown/Airport shuttle bus system, in conjunction with the South Station Transportation Center. The Commonwealth will seek to have the Massachusetts Aeronautics Commission act aggressively toward developing satellite airports, and will work with Massport to develop a program of remote passenger service centers for Logan-bound passengers.

394. The Preferred Alternative contains within its many project elements, a commitment to the Commonwealth policy of making public transportation work in the Boston region. Included in the Preferred Alternative is the opportunity for a program to provide for a Downtown/Airport shuttle bus system, in conjunction with the South Station Transportation Center. Direct bus access ramps between South Station and the Third Harbor Tunnel are provided. Bus ramps and bus lanes connecting to the Southeast Expressway are also included within this project. These are significant additions to the elements of the Preferred Alternative which are included as an overall transit-impact mitigating measure. Increased capacity and better operation of the Central Artery will provide increased opportunities for better bus service to the downtown area from both the south and north. See Section 4.2.8 Other Transportation Facilities for a discussion of the long-term impacts of the Preferred Alternative on public transportation, ferry services, and Logan Airport.

395. Public participation will continue to be an integral part of this project throughout later design stages; see responses to comment Numbers 380 and 384. We agree with the comment about the need for design controls and participation by citizens and professionals with access to technical assistance. These suggestions have been incorporated in the FEIS/FEIR discussion of the joint development process (See Section 4.4.4).

CARIBBEAN AIR LINES INCORPORATED / INTERNATIONAL AIRPORT / MIAMI, FLORIDA 33148 / 305-473-6600 6/6/83

VIA REGISTERED MAIL

August 16, 1983

Mr. Robert J. McDonagh
Chief Engineer
Massachusetts Department of Public Works
100 Nassau Street
Boston, Massachusetts 02114

Dear Sir:

The attached are Eastern Airlines comments for inclusion in the Final Environmental Impact Statement/Report on the Third Harbor Tunnel and Depressed Central Artery project. We understand the final report will be complete at the end of September.

Please add my name to the Report mailing list.

Sincerely,

John L. Lillibridge
John L. Lillibridge

Attachment

Written Comments for Inclusion in the Final Environmental Impact Statement/
Report for the Third Harbor Tunnel/Depressed Central Artery

Eastern Airlines supports the construction of a third Boston Harbor tunnel. It will provide improved vehicular access to Logan Airport for the traveling public, and in addition will reduce traffic congestion on airport roads and on neighborhood streets.

Eastern has been serving the Boston area through Logan Airport for over 40 years. We are the largest employer at the airport with approximately 2,000 employees with an annual average payroll of \$60 million. We have spent over \$50 million to develop a first-class facility at Logan and do not want to see its efficiency eroded.

After attending a number of working committee sessions and reviewing the Supplement to the Draft Environmental Impact Statement Report, Eastern is appreciably more seriously impacted by this project than any other organization. We are concerned about our ability to continue operations if Alternative 5A Modified is the selected alternative and substitute facilities are not provided. Three of our key facilities are in the direct alignment of the tunnel. They must be demolished and removed in order to excavate for the tunnel. New replacement facilities at least equal in size, standard and function must be built at locations acceptable to Eastern prior to demolition of existing facilities.

The first of these facilities is our New England Reservations Center. A new center must be built on a site removed from the tunnel. The proposal to structurally underpin the existing building appears to be unacceptable. Computers and telephone switching equipment cannot be subjected to vibration caused by construction activity or by traffic passing through a completed tunnel under the building.

The associated parking lot of approximately 400 cars must be relocated and fenced security of the site must be maintained at all times. Acceptable relocation sites are those now occupied by the General Aviation Administration building or the Butler hangar. Both buildings are scheduled for demolition. Relocation to either site is compatible with the Logan land-use master plan which shows low-noise activities immediately adjacent to the Jaffrey Point Community.

The second affected facility is the Eastern Air Freight building. All freight operations must be relocated temporarily to another building on the airport as close as possible to the Eastern terminal. The existing building can then be removed to allow for excavation of the tunnel. The reinforced concrete sections of the tunnel, designed to support a three to five story structure,

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August 16, 1983

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can support a new air freight building on the same location after the tunnel is backfilled and the site restored. The site could be accessed from the Bird Island Flare road. While the latest drawings show no direct connection between the inbound airport road and the Bird Island Flare access road, we anticipate that this can be corrected in order to prevent all traffic to Bird Island Flare from circuiting the main airport road system.

The third facility to be affected is the underground aircraft fuel tank system, its pumping station and vehicular fill station. While these functions could remain in place during and after construction of the tunnel, we understand that the EIS/EIR will show them as a "taking" because of their proximity to the tunnel exit portal. New aboveground tanks and a new pumping system must be constructed at a remote site. An underground supply pipeline with intermediate pumps would be required between the new tanks and the existing underground hydrant system which supplies fuel to the aircraft through pits at each gate. A new vehicular fill station will be required immediately adjacent to the west apron of the hangar.

The operations of these three facilities cannot be interrupted. The temporary and permanent buildings replacing these facilities must be designed, constructed, furnished and be in operating condition before we can move from the existing facilities. Because all moves will be done during night shifts, the duplication or phased relocation of equipment will be required at the new facilities. Most important is the duplication of computer and telephone switching equipment in the Reservations Center.

In addition to the extensive construction work and relocations required for the three facilities described above, we are particularly concerned about our terminal and hangar operations. We fully understand that when the tunnel is completed and all paving and grass areas are restored, no signs that a tunnel exists under the airport will be visible. But during the construction phase, our terminal operations could be severely impacted. In order to maintain normal flight schedules at the terminal and to provide access to the hangar for widebody aircraft, two new concourses must be constructed, and the commuter and Air-Shuttle operations must be interchanged. A temporary ground level concourse must be built south from the east end of the terminal for use by the commuters who will be displaced by construction of the center concourse. The center two-level concourse with passenger loading bridges and hydrant fueling pits for all gates will be built for Air-Shuttle flights. Both concourses will extend from the south side of the terminal toward the south. Upon completion of the center concourse, the commuters will be relocated to the existing shuttle satellite and the temporary concourse will be demolished.

The interchange of shuttle and commuters is required during construction to allow the hangar operations to continue uninterrupted. Smaller commuter aircraft parked around the present shuttle satellite will allow widebody aircraft to access both sides of the hangar.

Page 2 of 3
August 16, 1983

Delays and cost caused by construction work close to operating aircraft can cause serious damage if ingested by a jet engine. All precautionary steps must be taken to prevent this.

Finally, we understand that the cost of all relocations, phased construction, temporary and permanent replacement buildings, special equipment and moving expenses will be a part of the overall budget for the project.

Page 3 of 3
August 16, 1983

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RESPONSE TO COMMENTS BY EASTERN AIRLINES INC. (August 16, 1983)

396. The Commonwealth is aware of the potential impacts to Eastern Airlines, and will take steps to mitigate these impacts. It may be possible to underpin the existing Reservations Center in a manner consistent with Eastern Airlines operational requirements. Alternatively, it may be necessary to relocate the Eastern Airlines Reservations Center. If it proves necessary to move this facility, it would be relocated to a new site immediately adjacent to the existing site, without interruption in service. See Section 4.3.2 Displaced Businesses and the Availability of Comparable Relocation Space. As indicated in Section 4.3.2, additional engineering studies will be performed during preliminary design to refine the tunnel alignment and to determine the most appropriate techniques to assure the continued operations of the Reservations Center.

397. Employee parking will be provided for the Eastern Reservations Center. See Section 4.4.3 in LAND USE IMPACTS. The exact location will have to be developed by the MDPW in association with Massport and Eastern Airlines, Inc., to coordinate the reutilization of available land.

398. Construction of replacement facilities for the Eastern Air Freight building will be completed prior to the taking of the structure. Following construction of the project, freight facilities could be replaced in their existing locations. Initial design studies indicate that direct access to the Bird Island Plaza Access Road from the Airport access (inbound) road can be replaced; see Section 4.4.3 in LAND USE IMPACTS.

399. Construction of the Preferred Alternative does not require the taking of the underground fuel tank system, pumping station or vehicular fill station. Some pipelines may require relocation and would be performed as part of the project; see Section 4.15 PRIORITIES in the FEIS/FEIR.

400. The staging of construction of the project in this area has been developed in cooperation with Massport to ensure the unharmed continuous operation of service by Eastern Airlines. Mitigating measures to ensure uninterrupted operations at the Eastern Terminal during construction are described in some detail in Section 4.4.3 of the FEIS/FEIR section on LAND USE IMPACTS.

401. The Commonwealth totally concurs that impacts to aircraft operations are an important issue. Aircraft access to the Eastern Airlines hangar will be continuously maintained by means of constructing a temporary satellite terminal and relocating a taxiway. During tunnel construction, commuter airlines will be relocated to the present Eastern Shuttle satellite, and the shuttle aircraft will be relocated to the completed temporary satellite facility. During preliminary design, the issue will be addressed in further detail in cooperation with Massport. Standards will be developed that must be adhered to in the construction process. The FEIS/FEIR discusses the provision of temporary satellite facilities to maintain these airline services; see Section 4.4.3 in LAND USE IMPACTS.

402. All affected businesses will be compensated according to the rules and regulations of the Federal Highway Administration. The specific components of each relocation package will be determined during later phases of the project. Section 4.3 RELOCATION IMPACTS discusses several sources for funds in addition to the relocation benefits available through the MDPW for displaced properties.

3. Noise, vibration and dust control: Every conceivable method to control the harmful effects of noise, vibration, and dust control should be employed. Strict adherence to the City of Boston Noise Regulations should be included in all construction contracts and monitored with sanctions for offenders. This must include the measurement and certification of all vehicles and equipment used on the site.

lubrication caused by construction equipment must be minimized. No "hard" driven sheet piling or soldier piles and lagging should be permitted in proximity to buildings at Mass. Tech Center since such proximity would cause measurable vibrations, noise, and air pollution. Traffic operations, slurry wall techniques, and other methods of construction, including slurry wall techniques, should be employed.

Dust control measures are also quite vital to the satisfactory occupancy of our buildings. The watering of all excavations should be standard practice. This requirement is the same as that imposed upon us as the builders and developers of Bird Island Flats under the Environmental Impact Report which governs our activity. We feel that the same standards should be imposed on any and all construction at Bird Island Flats.

In summary, we are quite concerned that the impacts of construction might distort or inhibit the renting of facilities of Bird Island Flats. As you know, the economic impact to buildings which are fully constructed and paying interest to their lenders and are incapable of being occupied because of surrounding disruptions is severe. We believe that with careful and intelligent planning and the use of sound construction techniques, the Third Harbor Tunnel can be built without such impacts. We must be severely and irreparably harmed by the construction impact of the Third Harbor Tunnel. We seek, therefore, your careful study of the problems listed above and the assurance that everything possible will be done to mitigate the potential harm, including the loss of rent and consequent damages.

In addition to the impacts listed above, we would like to emphasize that it is quite important that the tunnel which is being constructed over a considerable period of time should be designed so that it serves the development not only of Logan Airport, but in particular of Bird Island Flats. Bird Island Flats should be well served by the Third Harbor Tunnel, particularly the incident of the tunnel being served by the ramp system which we have seen for the tunnel provide this access in a direction going toward downtown Boston. However, a serious flaw in the design of the tunnel is not directly provided. In spite of the fact that we have seen the ramp system exists inasmuch as access for those coming from downtown Boston to the flats is not directly provided.

One of the major problems which we feel that the access both to and from the tunnel by tenants at Bird Island Flats should be immediate and direct. Recent drawings which we have seen for the tunnel provide this access in a direction going toward downtown Boston. However, a serious flaw in the design of the tunnel is not directly provided. In spite of the fact that we have seen the ramp system exists inasmuch as access for those coming from downtown Boston to the flats is not directly provided.

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With a major addition to the airborn gases that would emanate from the tunnel. Such mitigation is properly the responsibility of the entity constructing the tunnel. With careful planning it can be dealt with so as to provide maximum benefits to our project as well as to East Boston as a whole. Similarly, noise studies which examine the question of airborn noise from both vent shafts, air intakes and tunnel portals is essential. Noise and air pollution studies are required for tunnel design. It is believed that the design of the tunnel and the studies which would include alternative locations as well as configurations for tunnel elements which would affect air and noise.

We trust that the substance of this letter is adequate for you to carefully assess our concerns and to address them in any subsequent environmental work. We believe that the tunnel, if properly designed, will improve access between downtown and the airport, of which Bird Island Flats and Massachusetts Technology Center are a major part.

Thank you for your consideration.

Sincerely,

MASSACHUSETTS TECHNOLOGY CENTER ASSOCIATES

By *Anthony Pincard*

General Partner

/s/

cc Secretary Frederick Salvucci, E.O.T.C.
William Coleman, Massachusetts Port Authority
Lucy Ferullo, Air Inc.
Robert Fennell, Massachusetts Port Authority
David Davis, Massachusetts Port Authority

RESPONSE TO COMMENTS BY MACOMBER DEVELOPMENT ASSOCIATES
(AUGUST 22, 1983)

403. Construction vehicles will not use the Bird Island Flats Access Road as their primary route. A construction access road to the east of the Bird Island Flats Access Road will be used; see Section 4.4.1, Prefabricated Alternative Land Use Impacts.

404. We concur with this observation, and it appears possible to route that Bird Island Flats Access Road in such a way that it will not pass over the tunnel construction site during any phase of construction. Accomplishing this goal will be a special objective to be attained in the design phase.

405. Access to Bird Island Flats will be maintained at all times. As a mitigating measure, a specific design requirement is the replacement of the direct "right-turn" movement to the Southwest Service Area and Bird Island Flats from the inbound access road, to be accomplished in the design phase.

406. Access to loading docks at the Massachusetts Technology Center can be maintained at all times. Coordination of the construction staging plans with MTC will be required to assure access and minimal inconvenience to tenants.

407. Strict adherence to City of Boston Noise Regulations will be required during construction. Dust and vibration controls will also be required during construction. See Section 4.8 NOISE AND VIBRATION regarding impacts and measures to mitigate these effects. Slurry walls will be used where the construction is near Massachusetts Technology Center.

408. The provision of direct access from the Third Harbor Tunnel to Bird Island Flats may be examined in subsequent design phases. If feasible and not environmentally damaging, this access could be provided to BIF. However, it should also be noted that the Massachusetts Technology Center Project benefits greatly from the improved accessibility of the tunnel, as designed in the FEIS/FEIR, relative to the No-Build Alternative. The use of Cross Street for local access connections is common to all non-terminal activities at Logan Airport.

409. The issues associated with the final design and location of the ventilation building are common throughout the project. In each case, it is necessary to begin the process of ventilation design to adequately assess the potential for improving upon the designs and locations specified in the FEIS/FEIR. Air quality impacts are discussed in Section 4.7 and the issue of ventilation stack design is specifically addressed in Section 4.7.3. The FEIS/FEIR indicates that compliance with the Commonwealth's NO_2 policy level of 320 micrograms/cubic meter will be required for the ventilation building emissions; measures to mitigate this impact are described in Section 4.7.5. Noise impacts of the ventilation building are noted in Section 4.8, and will be controlled by compliance with City of Boston Noise Ordinance Requirements.

8/18/83

What effort will the project
(and possible related pedestrian)
have as the pre educational
institutions and the population
of area?
J. Robert Dwyer, Jr.
Mayor - Canton, Mass.

RESPONSE TO COMMENTS BY ROBERT J. CAPSIO (August 8, 1983)

410. Schools in the North End will not be directly affected by the project. The construction corridor is well removed from any school. Heavy construction vehicles will be restricted to the project haul road, and mitigating measures will be specifically designed and incorporated into the project to reduce traffic impacts on local streets during the construction period. See Section 4.2.9 for a discussion of construction period traffic impacts, and Section 4.5 for a discussion of the projects impacts on neighborhood and community facilities in the North End.

0121 030-2121

1981

Robert J. McDonald, Jr.

U.S. Department of Public Works

10025 SUMMIT

61120 **W** 1971 141

General Battery/Third Harbor Tunnel Project

Mr. McDonald:

[illegible]

National has a more direct concern with those alternatives which include a third tunnel. National can see the benefit such a tunnel can provide; we note that a new tunnel alternative would require taking the area we currently occupy at the airport as well as other areas. National can also support such an alternative if a taking will not result in eliminating our ability to conduct business on the Airport. The State must make us aware that we are fully compensated for any and all of our property interests that we may lose. In addition, long-term planning during construction of the tunnel must take into account the future needs of the Airport. National must provide National with alternate space of comparable size, location and access to the terminal under terms identical to those we are able to move into this space on the day we lose the space. We must have the ability to operate from our present site. If National is provided without compensation that the above will be accomplished, we can give up the existing tunnel.

It is my understanding that all matters raised by written comment will be addressed to the final Environmental Impact Statement. National looks forward to receiving appropriate assurances that the State will not put it out of business but will deal in a fair and equitable manner.

Thank you for your attention to this matter.

11-11-11

OPTIONAL CAR RENTAL SYSTEM, INC.

Robert Butte,

1700: F. Boute

Library - Properties Department

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and previously, can affect the

RESPONSE TO COMMENTS BY NATIONAL CAR RENTAL SYSTEM, INC.

The importance of an Airport location to the operation of National Capital Area International Airport is clear. All property taken for construction of the Third Harbor Tunnel will be compensated consistent with applicable Federal Highway Administration rules and regulations. Section 4.3 RELOCATION IMPACTS discusses the availability of comparable relocation space for displaced businesses and the relocation procedures and benefits paid by the Massachusetts Department of Public Works.

Massport has indicated it will make every effort to assure the continued operation of affected businesses on alternate sites on Airport property or on suitably zoned property.

382 407 857

To whom it may concern/ Concerned Parties

Enclosed please find a copy of the Coalition Against the Third Harbor Tunnel critique. This critique of the DEIS/DEIR and the SDEIS/STHIR of the Third Harbor Tunnel, Interstate 90/Central Artery/ Interstate 93 has been prepared as a result careful review and investigation. Added to this package are the position statements and press releases of member organizations, community groups and individuals.

Your review and comments regarding this information will be of assistance and will be appreciated. Please mail your written comments to: Coalition Against the Third Harbor Tunnel, 36 Frankfurt Street, East Boston, MA. 02128

Thank you,

John S. Salovey

Chairperson
Coalition Against
the Harbor Tunnel

8 August 1963

TO: FWA
Mr. James A. Walsh
Division Administrator
55 Broadway, 10th Floor
Cambridge, MA 02142

and

FROM:
Mr. Robert J. McDonagh, P.E.
Chief Engineer
100 Ashue Street
Boston, MA 02114

Re: Third Harbor Tunnel, Interstate 90/Central Artery;
Interstate 93, Boston, Massachusetts;
Comments on NEPA-EOPA No. 4325, Resubmitted

FROM: COALITION AGAINST A THIRD HARBOR TUNNEL
36 Frankfort Street
Boston, Massachusetts

Dear Sirs,

We have reviewed the DEIS/DEIR and the SDEIS/SDEIR and within the very short review period we have prepared a series of comments for your review in accordance with the Massachusetts Environmental Policy Act (MESA) EOPA No. 4325 and hereby submit them for consideration and response.

Basically, our position is that the Coalition Against a Third Tunnel (CATT) opposes the construction of any third harbor tunnel because the third harbor tunnel would create a third harbor tunnel which would increase the growth of Logan Airport and related services and traffic into surrounding residential communities. A new tunnel would discourage the use and development of public transportation, increase the use of private cars, and delay alternative projects to ease congestion in the existing tunnels.

Furthermore, the coalition is convinced that the state has not adequately considered potential environmental, social and economic impacts of a third harbor tunnel. The coalition has ignored many inexpensive alternative transportation solutions. We believe the one billion dollar price tag on a third harbor tunnel is too much to spend for a traffic problem. Boston needs a solution to a complex regional transportation problem that reaches far beyond the needs addressed by a single purpose harbor tunnel.

Many people endorse a third tunnel without fully understanding the tremendous effects on the environment, the economy, and the city of Boston. The coalition has conducted studies and policies have contributed to the popular misconception that Boston is in dire need of a third tunnel.

The coalition proposes the following alternatives to a third tunnel, and we urge the state to explore these and the other options thoroughly before considering plans for any future harbor crossing:

*Improved central artery and access to existing tunnel traffic;

*Permanent one-way toll system;

*Improved public transit and incentives to use it;

*Extensive ferry network; and,

*Cap on Logan Airport growth.

However, in the spirit of cooperation, the CATT, as stated in other papers, has continued to work with the State Administration in order to improve on today's transportation problems. It is in this spirit that these comments are submitted.

We have divided our initial comments in a series of ways, both by alignments for the tunnel and by categories for the generic comments as they relate to the total study and not to specific alternatives or alignments.

The comments are as follows:

General Comments:

1. Any tunnel alignment to East Boston (Airport, Jeffries Cove or Corral) would require an airport overthrust. This would require further encroachment of airport-related industries into the East Boston community. The additional traffic generated by another tunnel would also have an adverse impact on our neighborhood streets which are already overloaded with airport-related vehicles; i.e., air freight trucks, car rentals, shuttle vans and buses, taxis and airport customers.
2. A tunnel connection to CI is shif~~te~~ connection further north to Bell Circle Severe. This would make a future connection to Route 95 inevitable.
3. The tunnel fabrication site in Lynn as described will adversely impact wetlands affecting muskel flats, fish and water fowl. This should be addressed more seriously and in depth.
4. Any new tunnel would encourage people to use cars rather than Mass. Transportation. A regional transportation system must be developed towards the use of a balanced system which will not remove users from mass transit.
5. What is the content of dredged material? What route will be used to dispose of it? How will it be transported out of the work area? This was not adequately addressed and is a serious environmental issue.
6. The report is too judgmental, and makes assumptions without adequate data.
7. Not adequately addressed is water seepage during construction. Our present sewer system is antiquated and is not adequate to accommodate such seepage.
8. A concern that was raised and not addressed was that 10,000 gallons of sanitary sewage will be disposed of through on-site systems and through public sewerage systems.
9. Another concern that was raised and not addressed is the use, storage, and disposal of hazardous materials during construction which include explosives and oil-based materials.
10. All traffic studies were conducted prior to the implementation of one-way tolls. This needs to be restudied based on the one-way toll system now in effect.
11. It was stated that there will be an increase in the "ridership during construction. Can the "carry the additional people? Has this been reviewed and studied?

11. Expanding Mass. Transit should be considered to determine whether it would provide more permanent jobs than construction jobs for the immediate area. (Boston and ~~Mass.~~)
12. It is stated that there would be displacement of over 3,000 people from the area. Local relocation of over 3,000 people is a vital business is vital. Any loss of employment in the area is critical. Has relocation been studied?
13. The cost and amount of energy for lighting and ventilation are not adequately addressed and this will be a continued burden for the Commonwealth taxpayer.
14. Where does the excess material from the Artery and Tunnel come from? Is it for disposal? It is stated that some will be removed by truck on roads connecting to Route 1A. This is not adequately addressed. Route 1A to where? Much more must be included.
15. If alternative 6 is Depressed Central Artery ONLY (no new tunnel), why are provisions being proposed for connections to and from a future Third Harbor Crossing in both the Fort Point Channel, State and in the vicinity of South Bay? (P. 17 - Supplemental)
16. Alternative 1, which addresses impacts of redefining of the Central Artery, did not include improvements to the approaches of the existing Callahan/Sumner Tunnels and improvements to Cross Street.
17. A two-lane tunnel to the airport should be fully addressed in the Final RIS/21g.
18. There should be an increase in the tolls at the Callahan/Sumner Tunnels to provide for a free annual sticker program for East Boston residents. There should be sale of tokens rather than tickets to motorists to relieve toll booth congestion. This should be investigated to determine the effect on traffic.
19. Give MTA users to Logan Airport incentives for using Mass. Transportation (train and buses designed for baggage and passengers in mind).

- Alternatives 2: Westerly Tunnel with Central Artery Improvements (Railroad Alignment)
4: Westerly Tunnel without Central Artery Improvements (Railroad Alignment)

It is our understanding that Alternatives 2 and 4 are rejected in favor of the construction of a railroad alignment for a tunnel. This is not warranted (p. 12, Appendix 1 Scoping Process). Since they are carried forward in the EIR, we feel it necessary to list some brief comments:

1. A railroad alignment would "split" our community in two.
2. It would be inevitable to use our neighborhoods for additional purposes. The businesses that would be located in the area would be forced to relocate due to the construction of the tunnel. They would need to relocate.
3. Potential for changing land use from residential to accommodate relocated businesses would adversely affect the residential quality of both the Jaffries Point and Mt. Carmel neighborhoods.
4. During the construction period the Mt. Carmel area would have minimal access and egress. Mental and physical stress would be placed on residents.
5. A proposed staging area on the East Boston Piers would have severe impacts on the elderly and handicapped in close proximity: Heritage Apartments, Victory Gardens Apartments and Landfall East Apartments. (Immigration building at 72 Marginal Street. This elderly housing was never mentioned in the report).
6. The vent emissions would adversely affect these same elderly and handicapped and many other residents with heart and respiratory diseases.
7. Traffic would be increased on our local streets during construction.
8. The potential development of the East Boston Piers 1-4 would depreciate.
9. The potential use of Fort Point Channel would also depreciate.
10. Structural impacts to buildings from pile driving not adequately addressed.
11. Several local businesses affected negatively.
12. There would be a devaluation of property resulting in tax losses to homeowners. Loss of equity and rental income not adequately addressed.

13. Visual aesthetics would be destroyed.
14. There would be significant environmental impacts not discussed.
15. There would be an impact on the access to the East Boston Memorial Stadium during construction and after.
16. East Boston's major Yire House on Sumner St. would be working under severe hardship for 3-5 years.
17. No realistic plan is presented for building bridges over the tunnel construction and completed tunnel.
18. These alternatives are in the floodplain since the alignment is at sea level.
19. The air quality at the E.B. Memorial Stadium would be further degraded.
20. The vibration impacts to the MBTA Red and Blue Lines not adequately addressed.
21. This is the most destructive alignment during and after construction to the local area.
22. No inventory was presented of the children using the local streets and bridges going to and from neighborhood schools (Dante Alignment on Cove St. and Webster St. East Boston Catholic on St.) one particular school (East Boston Central Catholic on Cove St.) one particular school (East Boston Central Catholic on Cove St.) one particular school (East Boston Central Catholic on Cove St.) These are all elementary schools.
23. Water seepage during construction into local antiquated sewers not addressed.
24. Short and long term reduction in the quality of life has not been assessed.

- Alternatives 3: Third Harbor Tunnel from Fort Point
5: Channel to Jeffries Cove/Airport Alignment
3a: Central Artery Depression with Third Harbor Tunnel via Fort Point Channel

1. During the construction of a Jeffries Cove Alignment, Porzio Park, Jeffries Yacht Club and Jeffries Cove in general will be adversely impacted. The yacht club will be forced to move to a new location. The club will be forced to close for a long time. The likelihood of forcing it to go out of business. This is the oldest chartered yacht club on the East Coast. The construction of the proposed Bird Island Flats Park would probably be delayed or hindered in its development. If developed, access from the neighborhood will be discontinued during the construction period of 3 - 5 years.
2. East Boston Memorial Stadium, protected by Section 4(f), will be impacted by the construction period and some land will be taken. The Stadium land was transferred to the City of Boston, Parks and Recreation Department in 1954 by the Commonwealth of Massachusetts in exchange for two city-owned recreational facilities, World War Memorial Park (65 acres - taken from a runway and Amerasia Playground) and Airport Recreation Center. This land was required for airport expansion. The Stadium operates more than 100 recreational facilities. Some of the activities at the Stadium are: track, tennis, football, baseball, basketball, Tot Lot. Users of the Stadium include: mentally retarded groups, New England Soccer Team, "A" ball teams, Little League and Minor League Baseball Teams, Revere Lancers, AYAC Day Camp and for general recreation. What accommodations will be made to accommodate the uses and the users?
Following construction the users of the Stadium will be exposed to an increase in impacts on the ambient environment already heavily impacted from the innumerable transportation facilities encircling the Stadium. Has the air quality been addressed adequately at this location?
3. The vent structure proposed at the end of Maverick Street has serious negative environmental impacts especially on the elderly and the residential community.
4. The toll plaza, adjacent to the vent structure, generates and concentrates pollutants creating another "hot spot".
5. The new traffic from a four-lane tunnel emptying into the Airport roadway hasn't been adequately addressed. It cannot "die" on the Airport, and will inevitably lead to additional road construction to tie into C-1.
6. Fort Point Channel would be adversely impacted by a tunnel alignment. There would be severe physical impacts on the Channel. While other cities in the world are creating man-made channels, we are destroying a natural beauty.

7. In many areas there may be structural damage to property during construction. How will this be addressed in the Final EIR/IS? How much money will be set aside to compensate for these damages? How will damages be assessed?
8. The impact on Gillette Company could be significant due to construction vibration and water use.
9. The MRA is not adequately addressed under these alternatives. No allowance is made for an extension of the Blue Line to the Airport terminals or across during construction.
10. How will the Blue Line be affected during construction?
11. Not adequately addressed were the impacts on the water quality of Jeffries Cove during and following construction.

The study did not include a review of:

1. The closure of Porter and Maverick Sts. to Logan Airport.
2. Relocation of airport-related business onto the Airport.
3. The reuse of East Boston land from which those businesses will relocate in a manner which is compatible with and improves our neighborhoods.
4. A solution to our Depressed Artery Traffic Problem (Rt. 1A and Chelsea Connectors).
5. The elimination of the opportunity for non-East Boston oriented traffic to use East Boston Streets.
10. We see no evidence of analysis of the location of the vent stack. We are unable at this point to determine how damaging the emissions will be.
11. Especially through the design of hook-ups to Rt. 1A, East Boston Stadium may have 47 impacts and certainly will have more traffic circulating around it.
12. It has been stated that tunnel construction will begin before the Depressed Artery construction. This leads to a 5+ year period in which the new & existing tunnels would serve as a displaced Central Artery -- UNACCEPTABLE. The effects of this construction phase have not been studied.

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Public Participation/Information

1. Considering the scope and potential impact of this project, holding only two working committee meetings since the addition of the new alternative seems too few to address the impacts, concerns and issues.
 - a. Are there a limiting of other meetings?
 - b. What other meetings will be held?
 - c. How will updated timely information be disseminated?
2. The information presented in the Supplemental Draft EIS, EIR is too difficult to understand in order to make rational choices.
3. The information is too technical for this stage of the process.
4. The study is not readable in the total package as it has not been adequately coordinated.
5. There was an inadequate number of copies of the Supplement distributed. Copies were received two weeks prior to the Public Hearing. Did this provide enough time to thoroughly review the material? This report is as you know two sets of 100 page books as well as seven appendices and four supportive reports.
6. The technical information is confusing to lay people and some knowledgeable technicians.

Water Quality

1. The tunnels of the Central Artery, South Boston Seaport Access Road and Third Harbor Crossing shall require cleaning from time to time. How will this cleaning take place as the pollutant particulates shall be washed down and conceivably be put into the sewer/drainage system which in time will affect our water quality. The methods of cleaning and disposal of residue should be addressed in all three tunnel locations.
2. The new alignments of 5A and 5A modified should be tested and confirmed relative to harbor sediment and impact on water quality.
3. As stated, dredging will take place over two years since 250 working days are required and we will not proceed during flounder spawning season between February 1 and May 15. Are other (other) marine life affected by this two year operation (shellfish, waterfowl, etc) due to the change in the water quality?
4. What are comments from Fish and Wildlife Service on the 5A modified alternative?

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Land Use/Economic

1. This aspect has not been studied in depth.
2. There must be more business input from the immediate areas of construction.

- a. There will be approximately twelve years of construction spread over several areas, for what return to the businesses?
- b. Who will compensate for their losses during construction?
- c. There will be potential for development of new developable land (air rights). This land could be turned over to the City for tax return uses.

Some process must be implemented for interested community to be able to participate in providing input and in the decision-making process.

4. Several Section 4(f) properties are impacted:

- a) Paul Revere Landing Park in the North Station area.
- b) Charles River Reservation and others.
- c) Fort Point Channel

There will be some permanent takings and some temporary construction easements.

All possible mitigating measures must be explored to minimize harm. A process must be implemented to allow affected communities to participate in designing the finished product.

Traffic

1. South End/Herald Street/East Berkeley Street not adequately addressed.

2. Will parking be replaced in Downtown/North End areas during and following construction?

3. What accommodations will be made for losses of parking spaces during construction? Will shuttle service be implemented?

4. Is a St. row Drive connector included in assumptions? (i.e., Route 1 from Mystic-Robin Bridge to Storow Drive)

5. Who approves or prohibits use of tunnels as hazardous cargo vehicle routes? Has application been made for use of these routes?

6. How will hazardous cargo traffic be handled on local surface streets?

7. What are the impacts if a Third Harbor Crossing were built after the Depreciation of the Central Artery?

8. The New Surface Artery has not been adequately addressed, as it will become a new Artery route than a local street. It is known as the same roadway in each direction, which is NOT a local street.

Air Quality/Ventilation Structures

1. Location of vent structures is questionable and must be investigated further.

2. Cleaning is not adequately addressed. This equipment shall have a concentration of pollutants and will require careful and controlled cleaning. How will this be monitored and by whom?

3. All measurements of CO and NO₂ were taken under ideal design conditions. It is stated that if there is malfunctioning of the ventilation fans there "could be a health hazard". "Could" should be "would". The procedures recommended to maintain the vent system "must be followed" not "should be" (p. 218 - SDEIS/7)

4. How is "acceptable" defined? (p. 218-SDEIS/8)

- a. Is this a Federal guideline?
- b. Is "acceptable" the minimum standard?

If so, we cannot accept "acceptable" because then the minimum becomes the maximum.

Visual/Aesthetic Impacts

1. The study makes judgments that areas would be better suited together than they are. These judgments should be made by the affected communities, i.e., the North End - they may feel more protected by the "walls".

2. How do the proposed new level bridges look from the Charlestown and Beacon Hill neighborhoods?

The shadowing effect reduces the aesthetic quality of the pedestrian walkway and the public recreation value of the area.

What is the visual effect across the Charles River?

3. Not adequately addressed are the adverse impacts of these bridges on the existing and proposed MDC park facilities along the Charles River

4. The Ft. Point Channel is visually affected by all alternatives and must be addressed.

5. The vent buildings need serious study before the design stage to investigate alternative forms and/or solutions.

Conclusion

In the year 2020 will we see three congested tunnels, more traffic on our local streets, more airport use in our neighborhoods and a cry-for a fourth tunnel to relieve that situation?

In general, we hope that these brief comments can be responded to in a satisfactory and timely fashion. As described in the report, we shall make any additional comments known prior to the August 22, 1983 deadline.

We also hope you will improve public participation at all levels in state transportation planning so citizens may play an active role in final transportation policy decisions which permanently affect the quality of life and the use of public funds.

Sincerely,

COALITION AGAINST A THIRD HARBOR TUNNEL
36 Frankfort Street
Boston, Massachusetts

COALITION AGAINST THE THIRD TUNNEL

C/O 36 Franklin St.
East Boston, MA
02128

DEC 3, 1964

PRESS RELEASE

PRESS RELEASE

PRESS RELEASE

Contact Persons:

Gina Scalcione
36 Franklin St.
East Boston, MA
569-3859

Mary Ellen Welch
Summer St.
East Boston, MA
569-3859

Residents throughout East Boston and the City gathered tonight to express dissatisfaction with the awarding of a Federal grant of \$3 million to fund an environmental impact study of a third harbor tunnel.

Concerned community groups and politicians have formed the Coalition Against the Third Tunnel in an effort to block funding of the study which they now will never be held.

There are two proposed routes for the tunnel, both originating in the Fort Point Channel area traveling across the harbor to either Bird Island Flats on Massport property or the Jeffries Point residential area in East Boston.

Estimated cost for the tunnel could go as high as \$2 billion, if it goes to Bird Island Flats. The coalition is opposed to both options and believes the tunnel will never go to the Flats because of the cost and Gov. King favors the Jeff-

- more -

Ins Pt. location. East Boston resident and coalition member Lucy Ferullo states, "Any discussion of construction to Bird Island Flats is just a smoke screen for where King really wants his tunnel to go. He wants it in Jeffries Point following the Gamwell tracks and cutting through the Mt. Carmel neighborhood."

Private consultants have stated that to build the tunnel directly to the airport would mean a minimum of \$150 million in extra cost. Airport construction would mean the relocation of the Eastern Airline terminal, a proposal considered highly unlikely. Any construction to the airport would jeopardize construction of mixed-use facilities on Bird Island Flats. Construction of these facilities is mandated by an agreement between Air Inc., a community group, and Massport. In an effort to buffer the neighborhood from the airport.

A tunnel built to the airport, considered private property, would mean the project is a "special purpose project" according to Federal guidelines and would need Congressional approval for funding.

The Coalition believes that the construction of the tunnel in a residential area will be chaotic and damaging to the neighborhood's quality of life, and endanger the health and safety of residents.

Due to the two existing tunnels, air pollution levels in East Boston, from high vehicular traffic, create extremely high and unhealthy levels according to DEQ studies. Construction in the canal area will mean that an exhaust fan, East Boston's third, will be built in the Summer St. area. This fan will emit carbon monoxide, a poisonous, odorless, tasteless, and invisible gas that kills by suffocation. This hardest on the aged, young and on people with heart and respiratory ailments. One such stack already exists next to a elementary school. The proposed stack will 80 feet high by 100 feet wide. There are three senior citizen homes in the immediate area.

If the tunnel cost were to be financed by the Turnpike Authority selling bonds, with reimbursement of 50% by the Fed and 10% by the State, then the cost for a one-

- more -

way fare could be \$1.25. Currently, the fare through the Summer-Callahan Tunnel is .30c.

The Coalition sees the current \$3 million dollar appropriation as a waste of the taxpayers money. With the \$3 million Boston could hire 300 firefighters, 430 police officers, or 410 teachers. \$3 million dollars is equivalent to all the money spent on housing assistance in Boston during 1981.

Follow-up actions to this first meeting are currently being planned.

PRESS RELEASE

December 3, 1981
Donald McKay School - Cottage Street - East Boston

For Immediate Release

COALITION AGAINST A THIRD TUNNEL (CATT)

A Statement of Purpose

The Coalition Against a Third Tunnel is composed of neighborhoods, organizations and individuals opposed to the construction of a third harbor tunnel.

Any harbor tunnel would be an expense of at least one billion dollars.

We oppose the spending of an amount of this magnitude for a project that has limited benefits and unlimited and chaotic economic, environmental and social repercussions.

The coalition believes there are more effective and efficient solutions to Boston's traffic congestion problems.

This Coalition is growing in size and determination. All the divergent neighborhood groups and individuals who are impacted have joined in a common struggle. The sense of outrage that is generated from the issue of another environmental nightmare, forced onto an already overburdened community, cannot be silenced or placated. The National Environmental Policy Act guarantees that those who are affected must be included in the scoping process.

On November 29, 1978 the Council on Environmental Quality published final regulations implementing the National Environmental Policy Act. Included in those regulations is a requirement that "there shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action."

Page 2

The CATT has a copy of a letter from N.J. Van Ness, Division Administrator of the Federal Highway Administration (region one) dated July 13, 1981 which denied the request for funds for an environmental engineering study for a third harbor crossing. Two reasons were given for opposing the study. (One and Two)- see below. The Coalition agrees with those reasons and asks that these problems be once again reexamined in an open public forum. The CATT asks to be included in "an early and open process" as the Environmental Policy Act requires.

1. The benefits to be accrued from these major construction alternatives are not in line with the tremendous costs involved.
2. The feasibility of advancing any of these major construction alternatives to construction in the foreseeable future has not been proven.

March 1, 1983

Secretary of Transportation
Frederick Salucci
20TC
One Ashburton Place
Room 1610
Boston, MA 02108

Dear Secretary Salucci:

The Coalition Against a Third Tunnel has reviewed the Draft Environmental Impact Statement/Report for the Third Harbor Tunnel Project, Interstate 90, and has serious objections to the findings and scope of the study.

First, it must be clearly stated that we are totally opposed to the construction of any third harbor tunnel. We have looked at the costs, the purported economic and transportation benefits and the environmental consequences and have concluded that spending public money on such a project is unwarranted, unreasonable and indefensible. In a pure cost-benefit analysis, the final economic benefits of a new tunnel would not even approach the costs that the state and federal governments would incur.

The range of tunnel alignments studied in the DEIS illustrates our concerns. One path often referred to as the "rail-road" alignment is a totally inappropriate land use and would maximize the project's impact on the East Boston community. Building a tunnel in that area would isolate the Jeffries Point neighborhood during construction and make use surrounding residential blocks almost unlivable, would place another large emission source in East Boston, and would further divide the community physically. We can only state that the proposed alignment is a valueless, air quality, health and safety hazard. Yet two of the DEIS's four build alternatives include this proposed alignment.

A second option, known as the "Jeffries Cove" alignment, would destroy one of the community's most valuable recreational facilities, given to East Boston when the Massachusetts Port Authority bulldozed Wood Island Park. Once again, traffic and exhaust fumes from this tunnel "would sit easy" at our homes and schools. This option presents the most dangerous alignment, but actually presents the least impact on the residential community. It would destroy the historic and scenic beauty of the waterfront, destroy the new airport's new Bird Island Plaza development, instead of asserting or continuing it on airport property.

The most outrageous failing of the DEIS is the total exclusion of any imaginative solutions to the transportation problems that create the present tunnel congestion. If a new tunnel were built in the spirit of this DEIS, the traffic problems at the existing tunnel entrances and exits would remain, and the Central Corridor would still have no connectivity. The state claims that new construction overruns the demand for a third tunnel, yet offers no solutions in the DEIS.

Page Two
Secretary Salucci

We call on the state to look at a number of smaller projects, which together could reduce traffic congestion to that gained by construction of a third tunnel. We have tried it for the last 20 years. The same circumstances in both directions, one-way tolls at the tunnels and the bridge, Central Artery improvements, physical improvements to the Cross Street area to improve traffic flow, and other creative projects. We feel that these solutions, largely ignored in the DEIS, can be implemented more quickly than a third tunnel, will provide an equal number of construction jobs, and will result in a greater net transportation benefit for Greater Boston at less expense to the taxpayers.

We ask that you consider the points we have made and proceed to re-examine the solutions for our traffic problem.

Sincerely,
Wesley M. White
The Coalition Against
a Third Tunnel

cc: Alex Tait

February 10, 1983

Secretary of Construction
Frederick Salvo
Executive Office of
Transportation & Construction
One Ashburton Place
Room 1610
Boston, MA 02108

Dear Secretary Salvo:

The Coalition Against a Third Tunnel is concerned that the process that led to the production of the Draft Environmental Impact Statement/Environmental Impact Review for the "Third Harbor Tunnel Project, Interstate 90" (hereinafter referred to as the EIS), was so flawed and inadequate that the EIS is useless as a public transportation planning document. The Coalition is concerned that transportation alternatives were not adequately considered, that there was insufficient notice of public participation, that there was insufficient notice of the comments received in the Environmental Monitor, that verbal testimony from the scoping hearings was recorded incompletely and inadequately; and that the scoping hearings provided no opportunity for individuals to influence the scoping process.

In late 1980 or early 1981, the Central Transportation Planning Staff presented its Corridor Planning Study at a public hearing with 13 alternatives. The hearing was held at the Boston Convention Center, which included both formal and non-formal sessions. With no public participation, the state quietly narrowed the 13 alternatives to five and applied for federal funding to conduct a DEIS/EIS for a third harbor tunnel. Only tunnel alternatives were part of the proposed study.

The scoping hearings occurred in the afternoon and evening of January 28, 1982. The EIS notes that MPA Director of Impact Review Sam Wyman presided at the hearing. The transcript of the hearing, which contained the transcript of the hearing, was not made available. The project had not been fully developed at the hearing date. Due to internal scheduling difficulties, because the Monitor is the primary source of information about such hearings, the public did not have adequate notice of the meeting or sufficient advance information about the proposed project to prepare for the hearings.

Despite the fact that public officials and citizens testified for more than an hour at the scoping hearing, the verbal testimony is summarized in the EIS in a single paragraph. It is apparent to us that the content of the verbal testimony was not fully recorded or understood by the project team which prepared the EIS. Documentation of testimony and attendance is so sparsely recorded in the EIS that the record on the hearing displays a verbatim transcript for the public participation process.

Page Two
Secretary Salvo

Speakers at the scoping hearings who suggested a broader investigation of solutions to the harbor transportation problem were not included in these statements and the approach of the project team we have detailed. These statements were limited to consideration of tunnel alternatives only. We lead us to conclude that the project team never intended to explore the most efficient or effective solutions to the area's most severe traffic congestion problems.

As written and conducted, we feel the EIS is incomplete, ineffective, and limited in scope. We hope you will ensure this document will be a useful tool in the state's transportation planning process. We also hope you will improve public participation at all levels in state transportation planning so citizens may play an active role in final transportation policy decisions which permanently affect the quality of life and the use of public funds.

Sincerely,
Gina Scalicone
Gina Scalicone
Coalition Against
A Third Tunnel

CATT

COALITION AGAINST THE THIRD HARBOR TUNNEL

C/O 38 Frankfort Street
East Boston, Massachusetts
02128

STATEMENT OF THE COALITION AGAINST THE THIRD HARBOR TUNNEL FOR
EXTENDED SCOPING MEETING APRIL 23, 1983

Over the last year and a half the Coalition Against the Third Tunnel, consisting of community groups, local, state, and federal politicians, has fought against a third harbor crossing. We believe there are other solutions to improving traffic flow through Boston. The beginning of one-way tolls is an alternative we have advocated and are pleased to see implemented.

Since the initial scoping session for the Third Harbor Crossing Environmental Impact Study we have viewed the process as a flawed, narrow, self-serving device to place a tunnel through East Boston, regardless of merit. At the initial scoping session we asked the study to be expanded to include alternatives and to examine the Central Artery, the core of the problem. We are pleased to finally have the study expanded in scope to address this most serious problem.

On April 23, 1983, in a public meeting with 250 people at the Mt. Carmel Church, Michael Dukakis committed himself to no new harbor crossing. He stated that bridge and road repair and reconstruction are a higher priority for the spending of transportation money. That holds as true today as it did then.

-1-

CATT STATEMENT (Cont'd.)

April 23, 1983

Recently, according to newspaper accounts, we hear that when a tunnel is built it will be done in such a way as to minimize community disruption. Such a plan does not and cannot exist. Despite the assurance of Secretary Salvucci or the intentions of

James L. Sullivan of the Greater Boston Chamber of Commerce to minimize the impact of a tunnel, the bottom line is that the interest of the technocrats, and the planners, are not our interest. These experts depend on business for their jobs and their salaries.

The Greater Boston Chamber of Commerce has a thirty year dream to build a tunnel. They view a tunnel in terms of their own downtown economic self-interest. To achieve these interests they will make promises, as they have in the past. In the old West End people were promised better housing, but when the real estate interests were finished there were only unattainable luxury apartments. In Mission Hill people were promised jobs and better housing.

Today much of Mission Hill has been laid waste by the medical establishment and a diesel generator waits to spew forth pollution and death. In the North End a once thriving waterfront now only serves the wealthy and downtown business interest. Through Roxbury and Jamaica Plain a scar called the Southwest Corridor has laid open for twenty years, blighting the neighborhood. Today as that project nears completion we hear of efforts to cut corners in the neighborhood stations to be able to afford a lusher station at Copley Place.

-2-

April 25, 1983

The business interest are now gearing up to make those same promises to East Boston. The promises we have heard for thirty years as we have watched a small airfield expand into the ninth largest airport in the world. The cost to us has been staggering, the uncertainty and anguish, loss of homes, the moving of families and friends to escape the impact of expansion: noise, traffic, the stretch of jet fuel burning in your nose. When will enough be enough? Another tunnel does not serve our interest. Looking at the past record, promises are empty. In the past we were less sophisticated; we believed it when we were told that for the homes taken in building the Summer/Callahan we could travel free when the tunnels were finished. Not this time, it is our intention to use this evening's meeting to once again raise the reasons for not building a tunnel and how to solve the traffic problems without one. Remember, we are the expert on community disruption, we are the community and we have suffered enough.

Coalition Against a Third Tunnel
c/o 36 Frankfort Street
East Boston, MA 02128

FOR IMMEDIATE RELEASE

Contact Persons:
Gina Scalcione
569-3699
David B. Brenner
268-7400

The Coalition Against a Third Tunnel, CART, spoke at the Environmental Impact Statement/Report (EIS/R) public hearing to present information on CART's position opposing construction of any third harbor crossing.

The Coalition is convinced that the State has not adequately evaluated many potential environmental, social and economic problems of a third harbor tunnel.

According to Coalition member, Gina Scalcione:

"The State is trying to pull a fast one over those people who are endorsing the Tunnel/Central Artery package. Salvucci is telling people if the study isn't completed by the September 30th deadline, everything will die. But according to the Federal Highway Administration, the Central Artery study was completed. The State created the time limit. The projects are separate."

While Secretary Salvucci has lobbied for support of many business and labor interest groups, the Coalition continues to have the support of Senators Kennedy and Tsongas and House Speaker Tip O'Neill.

-2-

PRESS RELEASE

The coalition includes mayoral candidates Raymond Flynn and Mel King. Their membership in the coalition is based on negative economic impacts a tunnel will have on all working class neighborhoods in Boston.

According to Sonny DePaulo of the Boston Typographical Union:

"... is major highway project will undermine public transit in Metropolitan Boston. The availability of employment for many people depends not only on whether workers can commute to potential workplaces. The very old and the very young who cannot operate automobiles and those who cannot drive are dependent on public transit. For others who can choose how they travel, the speed, comfort and convenience of public transit helps them decide where to work and shop and where to spend."

CART is submitting over 20 pages of testimony describing

short-comings of the EIS/R. Various Coalition members and supporters will testify on differences of process and discrimination by State transportation officials conducting the hearing. One example, is Coalition members being limited to eight (8) minutes of testimony, but elected officials, such as City Councilor Fred Langone, being allowed 30 minutes of testimony.

A Position Statement and description of alternatives has been released by the Coalition.

-30-

AIR QUALITY MONITORING AND VENTILATION

The Coalition Against the Third Tunnel takes serious exception to the Commission's (COT) report published in the Draft Environmental Impact Statement/Report.

1. LACK OF MONITORING TESTING FOR HYDROCARBONS, PARTICULATES, LEAD, AND THE SULPHUR DIOXIDES. WE SERIOUSLY BELIEVE THAT NO AIR QUALITY TESTING IS CONDUCTED IF THESE POLLUTANTS ARE EXCLUDED FROM A STUDY.

Over a hundred and forty thousand cars a year in the United States are attributed to air pollution. Studies have estimated that the total cost of air pollution in the United States is close to \$ 20 million. The nation's laundry bill for soiling due to air pollution is \$11 million.

Mixes of Hydrocarbons (HC), Carbon Monoxide (CO), and the Nitrogen Oxides (NOx) which combine in the atmosphere become exposed to sunlight and form photochemical oxidants. There is evidence that these oxidants cause respiratory irritation, (asthma) and that they decrease the lung's resistance to infection. They have been linked to premature aging and cancer in laboratory animals.

Particulates are in a range from very fine to large. The fine particulates, 1-2 microns in diameter, are small enough to be inhaled deeply into the lungs where they may remain for weeks or even years. They are often toxic and can lodge in the lungs where they can serve as carriers of other pollutants. The microscopic and clearance of other pollutants from the lungs is impaired. Particulates also cause irritation to the eyes, nose, and throat. They attach themselves to fine particulates that also escape into the atmosphere. Fine particulates can cause asthma, chronic bronchitis, emphysema and cancer.

Currently, the Massachusetts Turnpike Authority, which operates the present existing tunnels and would ultimately operate any further highway crossing, has agreed to monitor both ventilation buildings of the Sumner/Caldwell Tunnels for the above pollutants. The Air Quality Monitoring System for the above pollutants is being installed (MCS) but the report that pollutants other than CO are suspected in the auto emissions. The system as it stands now does not deal with any pollutants other than CO.

We are also concerned over the lead and the sulphur dioxide not addressed in the study. "...the most significant source of airborne lead is exhaust emissions from gasoline-powered motor vehicles." (Quoted from the EIS/EIS study). The report states that there is no lead in the exhaust of the new tunnel. The report also states that there are no sulphur dioxide emissions from the new tunnel. Mr. Charles Spencer of B&B can address this aspect of air quality as a local expert.

While it is agreed that the 5% content is by itself negligible it is the excess that concerns us in terms of pollution. Alone, it is known to increase difficulty in breathing, and in combination with particulates, it interferes with the body's defense mechanism. The SO₂'s are particular acid-causing pollutants which erode the surfaces of many buildings and automobiles.

On the whole, the study does not take into account the more known and dangerous air pollutants, their present and future quantity in the existing local air, and of course their mitigation.

2. WE DISAGREE WITH THE STUDY'S CONCLUSION CONCERNING AIR QUALITY DURING THE CONSTRUCTION STAGE.

Sequential closing of the bridges across the the right-of-way (Sumner, Newville, and Porter Streets) will affect the air quality of the area. Present traffic jams are a major problem. The study's conclusion that the construction impacts will be less than the impacts of the existing traffic is a gross understatement. These three streets have inadequate capacity to serve projected volumes. Added to this congestion will be construction-related traffic on these same local streets as trucks exit and enter the railroad-right-of-way. Restricting all tunnel traffic from building areas as suggested in the study, by closing Porter Street access to the airport or Bremen Street, North to South approach to the tunnel would dangerously impact the C-1 access to the tunnel. Long queues, traffic delays, time, longer idling would result. The study also fails to consider a rise in auto emission pollutants, number, kind, and quantity.

3. WE QUESTION THE LOCATION OF VENTILATION BUILDINGS, PARTICULARLY AS THEY GEOGRAPHICALLY RELATE TO SPECIFIC POLLUTIONS.

Suggested location of ventilation buildings near elderly housing is in total disregard of current medical research that the elderly are more susceptible to air pollution and less likely to have adequate resources to ward off pollution effects than any other population segment (excluding children). We question the advisability of locating these structures near the Heritage Apartments, Victory Gardens Apartments, and along Bremen and Haven Streets because of the heavy concentration of elderly in the area. (Heritage Apartments is 100% elderly; Victory Gardens Apartments and private housing on the two above mentioned streets contains approximately 50 - 60% elderly.)

4. WE STRONGLY SUGGEST THAT THE SIMILAR USE OF AIR-POLLUTION DEVICES - FAN SYSTEMS - IN CURRENT USE AT THE EXISTING TUNNELS IS AN INADEQUATE POLLUTION CONTROL SYSTEM

The current ventilation devices house fan systems which are the sole anti-pollution devices employed by the Massachusetts

Summary: As mentioned earlier in this report, new and enlarged monitoring will be done at the present ventilation buildings and pollutants other than CO. Upon the results of this monitoring, more equipment to the buildings may be needed in the form of precipitators, scrubbers, filters, etc. Therefore, any new venture has to take into consideration the findings and the resultant demands for anti-pollution devices.

We further question the suggestion of lowering the height of the ventilation building as this would impede the fan system's ability to disperse the air into the area environment. Existing ventilation buildings had to be built at a particular minimum to allow air to be "sucked up" through the shafts. This action was part of the anti-pollution mechanism in place to deal with CC emissions.

5. WE CONSULT THE NUMBER OF OBSERVATIONS UPON WHICH DATA HAS BEEN
(AND TYPE) ATTRACTED AND PREDICTIONS MADE

We believe that the study has not addressed the sensitivity of transmission factors with respect to temperature wind change and speed. We would like to see some more detailed modeling work done to help us quantify these. Winter months will present different problems than summer months. Winter months will affect Mr.'s vehicle AC's operation and CO decrease with increased speeds. Monitoring must be done at least at accelerated speeds. Monitoring must be done at all seasons or at peak and off hours over a longer span of time than two days. Monitoring must be done over several scenarios to give an adequate picture of the current air quality of East Baton Rouge. Limited numbers of observations have given relatively low readings which may or may not reflect true ambient current air quality such as ozone presence. Thus the limited amount of data collected precludes a definite assessment of violations of standards for air pollutants. In turn, long term effects are not predictable. We feel somewhat much of East Baton Rouge is not residential. The building of another racetrack would greatly increase these violations. We believe that air pollutant concentrations will be added from a third tunnel to the first and second tunnels, not mitigated by a third tunnel.

6. IN TERMS OF VIBRATION PROBLEMS FROM A THIRD WATER CIRCULATING, WE BELIEVE THAT THERE HAVE NEVER BEEN ANY ASSASSINATIONS OF LONG-RANGE VIBRATION EFFECTS OF AREA RESIDENTS AND PROPERTY FROM THE EXISTING TUNNELS; THEREFORE, NONE OF THE MATERIAL IN THE STUDY RELATED TO VIBRATION IS CONCLUSIVE.

it is felt that disregarding the background noise of aircraft which is constantly present in the local area is a serious error in judgment. We further feel that disregarding the background vibration caused by the Blue Star service underlying the background vibration caused by the Blue Star service is also a serious error. The use of the current levels and the predictions made from these levels should be figured. Therefore with a correct adjustment, the new tunnel would actually add considerable noise and vibration to the local area. The new tunnel would add considerable noise to the local area.

White says he'll fight China Harbor Tunnel

Continued from Page 1

[illegible]

The spokesman said, however, that the spokesman should have a better conception of the presidential campaign's impact on the economy.

Responding to the other speaker, White said, "I could have said that I'm tired of waiting. Nothing is out until the chairman comes out and the president comes out. But I'm tired of waiting. Nothing is to be gained by procrastination."

Members of the California Against the Third "Unred" Appellate Court, a coalition of groups that urged the decision, said that they were disappointed that the court threw out the case.

The mayor argued with our whole line of reasoning concerning the impact on East Boston. He agreed with our position that there would be no tunnel on an underpass at surface," said Mary Calkins, chairwoman of the committee.

[illegible]

The tunnel proposal has also drawn criticism from both US senators from Massachusetts. House Speaker Thomas P. O'Neill Jr., US Rep. Edward J. Markey of Massachusetts, who learned the project was being studied, said:

1. The first part of the document is a list of names and addresses, which appears to be a directory or a list of contacts. The names are written in a cursive script, and the addresses are listed below them. The list includes names such as "Mr. J. H. Smith", "Mr. W. B. Jones", and "Mr. C. D. Brown".

White opposes 3d Hub tunnel

by Allen Shapiro

...
Boston Mayor Kevin H. White last night announced his opposition to the proposed Third Harbor Tunnel, adding that without his approval the project, which has become Gov. Edward J. King's top transportation priority, cannot proceed.

Under current regulations, both the governor and mayors must oppose the project if the tunnel is to be halted, but it is not necessarily halted. The federal government will approve the proposal, New York's governor will approve it, and the mayor has come out against it, according to Robert W. Carr, a Boston attorney who helped draft the law. Carr was in the early 1970's

TUNNEL Page 21

COALITION AGAINST A THIRD TUNNEL

Position Statement

The Coalition Against A Third Tunnel (CAAT) opposes the construction of any third harbor tunnel because the coalition believes any new crossing would encourage the uncontrolled growth of Logan Airport and uncontrolled services and traffic into surrounding residential communities. The coalition believes that any new crossing would encourage the uncontrolled growth of Logan Airport and uncontrolled services and traffic into surrounding residential communities. The coalition believes that any new crossing would encourage the uncontrolled growth of Logan Airport and uncontrolled services and traffic into surrounding residential communities.

Furthermore, the coalition is convinced that the state has not adequately evaluated many potential environmental, social and economic problems a third harbor tunnel would create, and has ignored many inexpensive alternative transportation solutions. We believe the one billion dollar price tag on a third harbor tunnel is too much to spend for a traffic problem. Boston needs a solution to a complex regional transportation problem, not a new, unnecessary, and expensive third harbor tunnel.

Many people endorse a third tunnel without fully understanding the tremendous effects on the environment, the social fabric and the local economy during and after construction. We believe that inadequate transportation studies and policies have contributed to the popular misconception that Boston is in dire need of a third tunnel.

The coalition proposes the following alternatives to a third tunnel, and we urge the state to explore these and other solutions thoroughly before considering plans for any future harbor crossing:

- Improved central artery and access to existing tunnel traffic;
- Permanent one-way toll system;
- Improved public transit and incentives to use it;
- Extensive ferry network; and
- Cap on Logan Airport growth.

Members of the Coalition Against A Third Tunnel include:

Full Members

- Former Lieutenant Governor Thomas P. O'Neill III
- Former State Representative Paul Long
- Former State Representative Robert J. Conner - removed 8/7/83
- Boston City Councilor Ray Flynn
- Boston City Councilor Frederick Langone
- Cambridge City Councilor David Sullivan
- South-Coast-Sheriff-Bureau-Harvey - removed 7/83
- Governor Michael Dukakis
- Airport Impact Relief, Inc. (AIR Inc.)
- East Boston Area Planning Action Council (APAC)
- East Boston Area Planning Action Council (APAC)
- East Boston Community Center for Public Safety
- East Boston Harborwide Committee
- Grove Street Citizens Committee
- Jeffrey Point Harborwide Neighborhood Association
- East Boston Land Use Advisory Council
- Massachusetts League of Women Voters

Supporters

- US Senator Edward M. Kennedy
- US Senator Paul Tsongas
- US Representative Robert J. Conner - removed 8/7/83
- US Representative Edward Markey
- Boston Mayor Kevin H. White
- Former Joint Transportation Planning Council Chair Allen Taft
- Bay Village Associates
- O'Neill Heights Improvement Organization

ALTERNATIVES

IMPROVEMENT OF THE CENTRAL ARTERY

In Boston traffic congestion occurs because too many vehicles are using an inadequate and poorly designed highway system as the main north-south artery. The central artery should be recognized as the prime cause of the traffic congestion, and not the tunnels. There are numerous merges on the artery, like the bottleneck where Atlantic Bridge traffic merges with I-495 traffic, which prevent traffic from moving smoothly, and limit full capacity use of the bridge and tunnels. Bikes-up the artery.

to get to and from the North End. Cars and trucks parked and double-parked at the North End bus-transfer area further stall traffic. East ramps that were separated from local traffic and a pedestrian crosswalk would not only make traffic flow more easily, but would also greatly increase safety. The artery traffic has reached a level where it can no longer be integrated with local street safety or efficiency. The artery demands immediate attention and extensive improvements.

PERMANENT ONE-WAY TOLLS

About ten thousand vehicles pass through the Callahan Tunnel each day during rush hours. About 40 per cent of these vehicles are headed for the airport. The joint Mass. Port Authority-Mass. Turnpike Authority one-way toll experiment at the tunnels and the bridge conceived of in the early 1970s, but started only in 1981, has cut minutes off the travel time to the airport, and has made the tolls more effective. The tolls have also been used to fund other transportation improvements in many other major cities: California, New York and New Jersey have all instituted one-way tolls on their tunnel and bridge networks and have seen significant improvements in traffic flow and management. The state should make the Boston one-way toll experiment permanent immediately.

IMPROVED PUBLIC TRANSPORTATION

Public transit improvements must make it easier for travelers with luggage to move to and from Logan Airport. The Blue Line northbound train should be extended to the airport, and the existing transfer from train to bus and the waiting and luggage-lugging that come with it. Trains running on the spur could have cars equipped with specially-designed luggage carriers, and could run express from downtown locations. Only 6 per cent of Logan travelers now get to and from the airport on the Blue Line and the airport bus. This figure might be boosted substantially with better access to the airport tailored to the needs of travelers using the line. The tremendous advantages of having a direct, low-cost shuttle from Boston to the airport would far outweigh the relatively low construction costs of building a spur to a functioning line and would eliminate the need for the Blue Line extension. The Blue Line extension to the airport would also make it easier for passengers to get to the airport.

The state should also expand satellite parking areas near major highways like 93, 95, 495 and 1 and provide frequent express shuttle bus and limousine service to downtown Boston and the airport. This solution would help solve both a traffic problem and a parking problem in the Boston area. If the state actively publicizes the tolls, encourages their use, and clearly marks them on the highways, many more commuters will know about them and use them. Special airport shuttles could accommodate luggage. The success of satellite lots in cities as nearby as Hartford, Connecticut proves that people will keep their cars out of a congested city if there are incentives.

EXTENSIVE FERRY NETWORK

While the city's waterfront development is accelerating, the tremendous public transportation possibilities for the harbor are being overlooked. Some of the most effective and least expensive ways to reduce the shortest distance between Boston and the airport is by water, and have included ferry docks in their plans for the future. Massport and the state could encourage ferry service by linking the \$124 million Bird Island Flap development at the airport with Massport's \$125 million project at Commonwealth Pier by water. Ferries could easily handle the projected hundreds of thousands of yearly visitors and would add a distinctive, functional dimension to the accessibility of both projects.

Shuttle ferries to the airport could be only a single component in an extensive harbor ferry network to accommodate commuters from the north and south, workers at the shipyards and piers, and pleasure travelers headed for the harbor islands. Docks at Charlestown, the North End, South Boston and the Airport could be used to create a harbor ferry system that would connect waterfront neighborhoods. The successful Boston Harbor ferry system should also be expanded.

Special buses could link the ferry system with existing MBTA lines and the airport. Express buses with luggage carriers could take travelers from North and South Stations and central MBTA stops directly to the ferries headed for the airport. An extensive public ferry network linked to existing and expanded public transit lines would be a serious creative solution to some of Boston's transportation problems.

RESPONSE TO COMMENTS BY COALITION AGAINST A THIRD HARBOR TUNNEL

The comments of the Coalition pose many relevant concerns about the project. A number of the issues raised in these comments have been addressed as part of the design refinements reflected in the Preferred Alternative.

412. The Airport will continue to grow with or without the project, with traffic volumes on local streets increasing more with the No-Build Alternative than with the Preferred Alternative (SA Modified) (see Section 4.2, TRANSPORTATION). Construction of a Third Harbor Tunnel will not cause Airport growth; the relationship between the project and Airport growth is discussed in FEIS/FEIR Section 1.3.

Further encroachment of Airport uses into the neighborhoods of East Boston is a serious concern discussed in FEIS/FEIR Section 4.4 LAND USE. A program to review the impact of zoning and other land use control mechanisms (including various de facto licensing by Massport of off-Airport industrial uses) will be undertaken immediately as one element of a total program of mitigation to be included as an integral element of the Preferred Alternative. Lifting the EPA ban on Airport parking limits is being pursued by the Commonwealth. See Section 4.4.3 regarding land use impacts of the Preferred Alternative.

413. Year 2010 traffic volumes are projected to increase with the Preferred Alternative relative to the No-Build Alternative by about 6 percent (a.m. peak hour) or about 5 percent (p.m. peak hour) at Bell Circle. Traffic level of service at Bell Circle is "g" with the No-Build and all build alternatives. The difference in traffic conditions at Bell Circle between the No-Build Alternative and the Preferred Alternative is minor, and construction of a Third Harbor Tunnel will not encourage the construction of a connection to Interstate Route 95.

414. As indicated in the SDEIS/SDR2 and in the FEIS/FEIR, a tunnel fabrication site has not been chosen yet. During the design phase, a detailed analysis of potential impacts of several potential fabrication sites will be performed and a site will be chosen based on this analysis.

415. A discussion of the relationship between mass transit and a Third Harbor Tunnel is included in Section 1.3 MAJOR POLICY ISSUES in the FEIS/FEIR. As stated in the FEIS/FEIR, the Preferred Alternative will result in no loss of transit riders to Logan Airport as a result of the bus ramps linking the Southeast Expressway, the South Station Transportation Center and Logan Airport (see Section 4.2.3 Other Transportation Facilities).

416. The content of the dredged material is discussed in FEIS/FEIR Section 1.7 and 4.9 WATER RESOURCES, and in the Supportive Engineering Report. The disposal of excavated materials is discussed in Section 4.11 DREDGED AND EXCAVATED MATERIALS DISPOSAL. Additional analysis of these issues will be carried out during the design phase of the project. However, it is anticipated that the dredged materials will be removed by barge to the Four Hazard Area for disposal. Upland excavated materials will be trucked via construction haul roads and the regional highway network to approved disposal sites. To the extent possible, construction vehicles (heavy vehicles) will be restricted from the local roadway network.

417. To the greatest extent possible, the report is based on data which is described or reproduced in the Appendices and Supplemental Report which accompanied the draft documents. In some instances, professional judgment was the best available analytic technique.

418. Water seepage, or movement of groundwater during construction, is addressed in Chapter 5.0 of the Supportive Engineering Report. Use of slurry walls and other lateral support systems will be used to control groundwater drawdown. Section 4.1 DESCRIPTION OF CONSTRUCTION in the FEIS/FEIR also addresses the issue of groundwater fluctuation during construction.

Observation wells and well points will be used to monitor and control groundwater levels; discharge of groundwater into the sewage systems is not proposed, since it violates regulations controlling introduction of non-waste to the sewage system.

An estimate of 10,000 gallons/day was made of the amount of sewage that would be generated by construction workers during the construction period. It was not identified in the official Scope of the EIS/EIR as an area to be evaluated since the amounts generated were considered to be insignificant relative to the daily sewage generated in the City of Boston. Disposal will be dictated by standard construction specifications and in conformance with City of Boston and DBQ requirements.

419. Hazardous construction materials will be handled as required by city and state regulations, and further environmental documentation of this construction period issue will be carried out. Proper handling of hazardous materials will be included as a condition in all relevant construction contracts. The use, storage, and disposal of hazardous construction materials was not identified as a Scope item for the EIS/EIR.

420. Traffic analysis of the Preferred Alternative was prepared with a one-way toll system as the assumed method of operation. An analysis of various toll collection strategies was included in the Draft EIS/EIR (December 1982) Section 4.2.9 Consequences of Other Transportation Improvements. This analysis concluded that traffic operations (in terms of diversions from the toll facility to free facilities) did not vary significantly during peak periods between one-way and two-way toll collection systems.

421. The MBTA will be able to carry additional passengers. The current constraint on MBTA capacity is the limited availability of vehicles; the MBTA is pursuing a major program of vehicle acquisition. As a comparison, the MBTA recently acquired additional commuter rail coaches to increase service from South Station to meet increased demands during the ongoing Southeast Expressway reconstruction project.

422. Mass transit improvements were evaluated as part of a number of the regional transportation planning efforts carried out by the Commonwealth (Corridor Planning Study, 1980; North Shore Transportation Improvements Project, 1979). It was determined that transit projects could not adequately solve the region's core area and cross-harbor transportation requirements, and therefore, exclusive mass transit projects were not evaluated in this EIS/EIR. Major transit programs are being implemented as a result of the Boston Transportation Planning Review in the early 1970's. Although the emphasis for access to the CBD was shifted at that time from highways to transit, BTPR did recommend capacity improvements to the Central Artery and construction of the Third Harbor Tunnel. The Preferred Alternative includes exclusive bus ramps linking the Southeast Expressway, the South Station Transportation Center, and Logan Airport, allowing increased cross harbor bus transit service. The Commonwealth is also implementing other transit system and service improvements. The specific question of job generation and possibilities of mass transit alternatives is beyond the scope of this EIS/EIR.

423. All businesses which must relocate as a result of the project are eligible for the appropriate relocation assistance and compensation entitled

under the Uniform Relocation Assistance Act. It is anticipated that in most instances comparable relocation space near the businesses' current locations are available as relocation sites. Moreover, the Commonwealth will encourage the hiring of East Boston, South Boston, Chelsea, and Revere residents at the Airport and Airport-related activities. The Commonwealth also finds that it may be important to consider the provision of special incentives to businesses to assist them and ensure that they relocate in the immediate area. These options will be explored fully in the design phase. See Section 4.3.2 Displaced Businesses and the Availability of Comparable Relocation Space and Section 4.3.3 Related Business Economic Impacts for further discussion.

424. The cost and amount of energy required for lighting and ventilation are addressed in FEIS/FEIR Section 4.17 ENERGY and in the Supportive Engineering Report, Chapter 7.0. These costs are reflected in the annual operating and maintenance costs estimated for the project in Section 2.2 PREFERRED ALTERNATIVE.

425. The locations for excavated material disposal have not yet been determined. Further environmental documentation will be prepared during the project design phases concerning this construction period impact; see Section 4.13 DISPOSAL ALTERNATIVES.

426. In order to allow future decision-makers the option to build a Third Harbor Tunnel without causing significant disruption in downtown Boston, Alternative 6 was designed to accommodate a tunnel.

427. Alternative 1, the No-Build Alternative, is the base case against which other alternatives are evaluated. The Federal Highway Administration indicated that redeciding must be included as part of a realistic base case; other changes in the highway system are not included in the base case.

In the Draft EIS/EIR (December 1982) modifications to Central Artery ramps and their street intersections in the vicinity of the Callahan/Summer Tunnels were studied; see DEIS/DEIR Section 4.2.9, Consequences of Other Transportation Improvements for a discussion of their effectiveness in improving operations.

428. A two-lane tunnel has been studied in depth; see Two-lane Tunnel/Optional Port Channel Concepts, a Supplemental Report to the FEIS/FEIR. See also the discussion in the FEIS/FEIR Section 2.3 ALTERNATIVES CONSIDERED IN THE EIS PROCESS, and Section 2.4 REASONS FOR NOT SELECTING OTHER EIS ALTERNATIVES.

429. Provision of free tolls for East Boston residents is independent of the Third Harbor Tunnel/Central Artery project and therefore was not examined.

Toll collection procedures were not studied as a specific part of the FEIS/FEIR, but improvements in toll collection procedures are now being studied by the Turnpike Authority's traffic consultant as part of the Commonwealth's day-to-day operations efforts.

430. The South Station Transportation Center bus ramps are included in the Preferred Alternative as specific incentives to enhancing the use of mass transit between downtown Boston and the suburbs served by buses and trains to South Station and Logan Airport. The Commonwealth and Massport are pursuing the provision of remote airline "check-in" at South Station. See response to comment number 422.

431. Alternatives 2 and 4 have been explicitly rejected as possible projects; therefore no detailed responses to these comments have been prepared. The comments discussed by the Coalition are some of the reasons why the alternatives were rejected, see Section 2.4 REASONS FOR NOT SELECTING OTHER EIS ALTERNATIVES.

432. In response to these concerns listed by the Coalition and to comments received throughout the EIS preparation and during the public comment process, the East Boston alignment of the tunnel has been shifted towards the east to Bird Island Flats. There will be no impacts to Jeffries Cove, the Jeffries Cove Yacht Club, Portio Park, and the proposed Bird Island Flats Park.

433. The Commonwealth recognizes that the East Boston Memorial Stadium is a very important community facility and has modified the design of the project in order to reduce construction period impacts and eliminate long-term negative impacts. The Preferred Alternative requires less stadium land during construction than any other alternatives which include a four-lane Third Harbor Tunnel, as the other alternatives included an at-grade service road and construction of an additional southbound ramp from Route 1A to the tunnel entrance.

Construction period impacts on East Boston Memorial Stadium are documented in Section 5.1.1 East Boston Memorial Stadium in the SECTION 4(f) EVALUATION. Long-term improvements to the Stadium are also documented in that section. Beneficial air quality impacts at the Stadium are documented in Section 4.7.2 Microscale Analysis. The addition of three acres of land to the East Boston Memorial Stadium and the construction of noise barriers will significantly improve environmental quality at the Stadium.

434. In the Preferred Alternative, the ventilation building has been moved away from the community to Bird Island Flats; there are no perceptible negative impacts on air quality in the community.

435. In the Preferred Alternative, the toll plaza has been relocated to an industrial area of South Boston where it is one-half mile from the closest residential structures. There are no perceptible negative air quality impacts at sensitive receptors as a result of the toll plaza; see 4.7.3 Effects of Toll Plazas in the Air Quality Impacts section of the FEIS/FEIR.

436. In the Preferred Alternative, the roadway system at the Airport will operate better than with the No-Build Alternative, but internal Airport roadway modifications are still required. Connections to Route 1A are adequate as shown on the plans of the Preferred Alternative.

Traffic levels of service on Route 1A are good (LOS C or D), and the merging and exiting of Airport traffic will be accomplished without projects beyond the scope of the Preferred Alternative. See FEIS/FEIR Section 4.2.1 V/C Ratios and Levels of Service.

437. Many of the adverse aesthetic impacts on Port Point Channel which were documented in the DEIS/DEIR and the DEIS/DEIR have been mitigated by design modifications to the project. Aesthetic impacts of the Preferred Alternative are documented in FEIS/FEIR Section 4.16 AESTHETIC IMPACTS.

438. Structural damage to adjacent buildings is not expected to be significant. Measurement of vibration will be monitored throughout the construction period and damages will be recomended. See Section 4.3.2 Vibration Impacts for a discussion of possible impacts and measures to mitigate impacts.

439. Possible vibration impacts to Gillette (determined to be not significant) are discussed in FEIS/FEIR Section 4.8.2 Vibration Impacts. Water use impacts have been investigated and mitigating measures have been established to prevent negative impacts to Gillette (see Section 4.9.3 Preferred Alternative (re water resources)). Design modifications were extensively considered and implemented with close interaction with the Gillette Co. to mitigate impacts.

440. As part of this study (at the request of EOTC), Massport modeled the transportation impacts of extending the Blue Line to the passenger terminals. That study clearly revealed that only a modest ridership increase would occur as a result of this extension, while riders on the rest of the Blue Line (north of Airport Station) would experience longer waiting times.

A more general discussion of transit issues is contained in the FEIS/FEIR Section 1.3 MAJOR POLICY ISSUES and Section 2.3 ALTERNATIVES CONSIDERED IN THE EIS PROCESS.

Blue Line Service to the Airport and East Boston will continue throughout the project (off-peak service shutdowns for switchovers from the old to the new alignments between the MBTA and the Airport terminals will also be maintained at all times. Transit impacts are discussed in Section 4.2.8 Other Transportation Facilities.

441. Impacts to the Blue Line are discussed in Section 4.2.8 Other Transportation Facilities. Construction activities of the Preferred Alternative are discussed generally in Section 4.1, and are detailed in the Supportive Engineering Report.

442. The Preferred Alternative will not affect Jeffries Cove.

443. The additional 17,000 cross-harbor vehicle trips per day are included in the traffic model for the region. The distribution of all traffic in East Boston indicates that with the Preferred Alternative there will be less traffic on local East Boston streets than with the No-Build Alternative. Traffic impacts on East Boston are discussed in FEIS/FEIR Section 4.2 TRANSPORTATION; the topics specifically addressed are traffic volumes, traffic level of service, and safety.

444. The FEIS/FEIR includes an estimate of tolls required on all cross-harbor facilities to cover the Commonwealth's share of required funding, if the local share is funded entirely by tolls. However, the Commonwealth will be considering a variety of funding mechanisms and will be determining toll policy at a later appropriate point; see Chapter 6.0 LEGAL AND FINANCIAL CONSIDERATIONS.

445. Decisions as to whether tolls on the new Third Harbor Tunnel, the Sumner and Callahan Tunnels and the Mystic-Tobin Bridge should be equal will take into account likely traffic management consequences as well as any legal requirements. See Chapter 6.0 LEGAL AND FINANCIAL CONSIDERATIONS.

446. The decrease in revenues to the Callahan/Sumner Tunnels will be offset by the additional revenues gained through the Third Harbor Tunnel. Revenues generated by all cross-harbor facilities will increase with the construction of a Third Harbor Tunnel.

447. A discussion of the effect of the Preferred Alternative on transit ridership is contained in FEIS/FEIR Section 1.3 and Section 4.2. Before

addition of the bus ramps from the Southeast Expressway to South Station and from South Station to the Third Harbor Tunnel, the analysis showed that the project would cause a decline in rail ridership in the North Shore and northern corridors; that slight ridership gains could be predicted for express bus service from the west and southwest corridors; and in the southeast, rail transit was shown to decline, with a similar but smaller increase in express bus ridership. Total impacts showed a decrease in transit ridership of about 1.3 percent. With the addition of shuttle bus service from South Station to Logan Airport, the gain in transit ridership was forecast to largely offset any losses in ridership experienced on the rail system as a result of improved highway travel times.

448. Alternative 5A Modified, or the Preferred Alternative, is included in the summary chart in the FEIS/FEIR SUMMARY. For comparison purposes, the other alternatives are also presented in that chart.

449. One of the five major alternatives analyzed in full detail in the SDIS/SDEIR - Alternative 5A, a Depressed Central Artery and a "Seaport Access Alignment Tunnel" - was supplemented by further analysis and discussion of several design variations collectively known as the "Alternative 5A Design Modification".

These modifications were developed in response to specific public and community interest, expressed during preparation of the SDIS/SDEIR at NEPA scoping meetings, Working Committee Meetings and informal meetings of neighborhood residents (including representatives of the Coalition Against a Third Tunnel), and with State officials, in 1) the possibility of a tunnel alignment entering the Airport at Bird Island Flats instead of Jeffries Cove in East Boston, and 2) improving the ability of the Seaport Access Alignment to divert commuter and truck traffic from South Boston residential streets. Because these community suggestions appeared to offer significant potential to improve upon, or minimize the environmental impacts of, Alternative 5A, substantive feasibility studies of the modifications were undertaken.

The results of the 5A Modification studies were reported on in the SDIS/SDEIR to amplify the discussion of Alternative 5A, and to solicit public comment on whether the environmental benefits suggested by the preliminary studies were sufficient to warrant further evaluation and consideration of the 5A Modifications. Included in the SDIS/SDEIR was preliminary design information (for example, several engineering plans and profiles of the Alternative 5A Modification) were included in the Supportive Engineering Report; virtually complete impact analyses in areas such as land use, visual, economic, neighborhood, historic, relocation, and 4(f) impacts; and reasonable qualitative extrapolations from data about the very similar Alternative 5A in impact areas such as traffic, noise, water, dredge material disposal and energy.

Detailed analysis of all impact areas (except archaeology) have been performed and included in the FEIS/FEIR for the Preferred Alternative, which incorporates the Alternative 5A Design Modification. With respect to archaeological impacts, a Phase I, Step 1 survey was completed for the SDIS/SDEIR; and Phase I, Step 2 and Phase II surveys are expected to commence shortly under the terms of a Memorandum of Agreement signed by the Massachusetts Historical Commission, the Boston Landmarks Commission, DPW, FHWA, and the Advisory Council on Historic Preservation. The Agreement requires completion of these archaeological surveys and details subsequent treatment of archaeological properties; see Section 5.3 ARCHAEOLOGICAL STUDIES.

450. The potential temporary relocation of the Eastern Airlines satellite gate facility is discussed in FEIS/FEIR Section 4.4.3 Preferred Alternative (re land use impacts). Construction period air and noise impacts from this potential temporary relocation are discussed in Sections 4.7.6 and 4.8.1, respectively. If at any time it is proposed that this facility be made permanent, a separate environmental document would be prepared by Massport.
451. Impacts to aircraft operations are an important issue. Contract specifications will require dust control. During preliminary design, additional special provisions will be addressed in detail in cooperation with Massport. These impacts are addressed in Section 4.7.6 Construction Impacts re: Air Quality.
452. Impacts and necessary mitigation of impacts on the Massachusetts Technology Center are discussed in Section 4.4.3 Preferred Alternative (re land use impacts) and Sections 4.6.5 Development and Related Fiscal Impacts and 4.6.6 Construction Period Impacts on Development (re economic impacts). See also responses to comments by Macomber Development Associates and AIR, Inc.
453. Alternative 5A Modified is a design refinement of Alternative 5A. See response to Comment No. 449.
454. The Two-Lane Tunnel Concept has been evaluated and is considered second among the alternatives analyzed. There are significant reasons for the decision not to select the two-lane tunnel as part of the Preferred Alternative. Traffic service provided by this option would be inadequate by the design year when an additional two lanes of capacity would be needed; the cost savings of building the Two-Lane Tunnel Concept as compared to the Preferred Alternative is only \$334 million (approximately 14 percent). Other issues which led to the choice of a four-lane tunnel for the Preferred Alternative include the requirement of building a four-way interchange with the Callahan/Summer Tunnels, and differences in operational safety between a two-lane and four-lane tunnel. For further information see the supplemental report Two-Lane Tunnel/Optional Port Point Channel Concepts.
455. Traffic on Route 1A in 2010 with the Preferred Alternative is at level of service C or D, acceptable standards which do not indicate a need for further upgrading of Route 1A; see Section 4.2.3 V/C Ratios and Levels of Service.
456. As discussed in the response to Comment No. 412, the Preferred Alternative will reduce the amount of traffic on local streets as compared to the No-Build Alternative, a positive impact for the East Boston Community; see Section 4.2.2 Traffic Volumes.
457. Air quality analysis of the Bird Island Flats ventilation building is included in the FEIS/FEIR; see Section 4.7.5 Effects of Ventilation Building Emissions.
458. Traffic circulating around the East Boston Memorial Stadium will be reduced by approximately 20,000 vehicles per day (in 2010) with the Preferred Alternative relative to the No-Build Alternative (see Section 4.2 TRANSPORTATION). Temporary and permanent Section 4(f) impacts are discussed in Section 5.1.1 East Boston Memorial Stadium. The Section 4(f) analysis indicates that a small portion of the Stadium will be temporarily affected during construction, but in the long term, the Stadium will be enlarged and access, air quality, and noise characteristics will be improved by the project.
459. The tunnels (existing plus new) will not function as a diaphragm. Central Artery because their traffic flow characteristics do not allow them to

- see Section 4.2.9 Construction Impacts. Additional traffic impact analysis will be done during the design phase when more information on detour routes and staging are available.
460. The meetings which were held include two Working Committee Meetings (6/13/83, 7/17/83), and five public information meetings (7/28/83, 8/1/83, 8/2/83, 8/3/83). Consultant staff and agency personnel were available to answer questions throughout the project. Numerous informal meetings were held by DOT and MBPW with any neighborhood group that so requested. A newsletter which included a description of the Alternative 5A Modification was distributed on July 26, 1983. Further citizen participation will be an integral part of the design process, and will include opportunity for informal meetings and issues workshops as well as design public hearings.
461. The SDEIS/SDEIR was prepared with the greatest degree of clarity possible. Public agency personnel and consultants were available to answer questions and to provide further information at the request of any member of the public. In addition, a consultant was specifically provided to the East Boston community to improve the exchange of information between the project planners and designers and the interested citizens.
462. In order to meet the requirements of federal and state agencies, as well as the public, technical information was required at this stage of the process. It is interesting to note, however, the Coalition's requests for additional technical information in previous comments.
463. The best efforts were made to provide a clear and understandable package of information and analysis. A SUMMARY was included at the beginning of the SDEIS/SDEIR, and was separately mailed or distributed at informational meetings to approximately 1,500 persons.
464. Approximately 500 copies of the SDEIS/SDEIR were distributed; 200 on the day of publication and another 100-200 within two weeks. A copy was distributed promptly to any member of the public who requested it at any time during the comment period. Copies were also readily available for review at several public libraries, including the East Boston branch, and also at the offices of the MBPW, the DOTC, and the Executive Office of Environmental Affairs.
465. See response to Comment Nos. 462 and 463 above.
466. Water used in cleaning the tunnels will be captured in a closed system which will allow sedimentation of solids and removal of oil/grase before discharge to the sanitary sewage system; see Section 4.9 WATER RESOURCES.
467. Water quality impacts have been evaluated for the Preferred Alternative throughout Section 4.9 WATER RESOURCES. In accordance with agreements with the U.S. Army Corps of Engineers and the U.S. Fish and Wildlife Service, additional biological analysis of the sediments along the Preferred Alternative alignment will be performed during the design stage. As noted in the SDEIS/SDEIR and in the FEIS/FEIR, the sediments of two adjacent cross-harbor alignment are not expected to be too different from those of the other alignments, and the quality of the sediments are expected to meet ocean disposal requirements.
468. Impacts on wildlife and aquatic life are very limited (see Section 4.9.3 and Section 4.12.3). As indicated in Section 4.9.3, dredging of the shorter cross harbor tunnel will require about 40 days and will be completed in about 8 months.

469. See comments and responses to U.S. Department of the Interior, Fish and Wildlife Service in this volume.

470. Land Use and Economic Impacts are addressed in Sections 4.4 and 4.6 of the FEIS/FEIR.

471. Impacts on local businesses are addressed in FEIS/FEIR Section 4.6.4 Impacts to Subarea Economics. Joint development is addressed in Section 4.4.4 Joint Development. The Commonwealth concurs that protection for local businesses and community participation in the development of air rights is of critical importance. The State will explore mechanisms to minimize business impacts and work with the City and the business community to achieve this public input.

Compensation for businesses displaced by construction is discussed in FEIS/FEIR Section 4.3.5 Massachusetts Department of Public Works Relocation Procedures. The Commonwealth is investigating possible construction period strategies to further mitigate business impacts on businesses not affected by full or partial takings.

Community based task forces will be established to provide direct involvement in planning as it affects sub-areas. Community input will be sought on the structure of this process and to help refine mitigation measures, refine ventilation building appearance, use of land created/ significantly affected by the project, etc. See Section 4.4.4 Joint Development for further discussion on community participation.

472. Impacts on Section 4(f) properties are addressed in FEIS/FEIR Chapter 5.0 SECTION 4(f) EVALUATION. Mitigating measures to Section 4(f) impacts have been incorporated into the proposed design of the Preferred Alternative, and are also discussed in Chapter 5.0. Further design work will be subject to open community participation and design public hearings.

473. Traffic impacts on the South End have been made positive with inclusion of Herald Street Extension and moving previously proposed ramps; see FEIS/FEIR Section 4.2 TRANSPORTATION.

474. Displaced under-artery and publicly-owned parking spaces (under the Central Artery in Financial District, Waterfront, North End) will be replaced prior to the loss of this existing parking by construction of the project. These impacts are discussed in Section 4.2.10 Parking Impacts and Section 4.4 LAND USE IMPACTS.

475. As stated above, all parking lot spaces displaced in the North End, Waterfront, and Financial District will be replaced. Shuttle services and other parking options are discussed as mitigating measures for construction period or long-term parking replacement. The Commonwealth intends to provide replacement parking in close proximity to the neighborhoods. See FEIS/FEIR Section 4.4 LAND USE IMPACTS, and Section 4.2.10 Parking Impacts.

476. A Storrow Drive connector from the Mystic River Bridge is not included in the Preferred Alternative. As discussed in Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE, the Storrow Drive (Main Street Circle) Connector has been opposed by various residential neighborhoods, and would have adverse Section 4(f) impacts. Since these impacts could not be avoided, the Connectors are not included in the project.

477. The U.S. Department of Transportation, the Massachusetts Department of Public Works, and the City of Boston all take part in decisions concerning the

of tunnels by vehicles carrying hazardous cargo; see FEIS/FEIR Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE. All necessary applications and approvals for use will be secured at appropriate times during project development.

478. Vehicles carrying hazardous cargo in the Central Artery corridor will use the Surface Artery, as they do under existing conditions. The applicable State and City regulations will govern their use of public streets. In South Boston, these vehicles are expected to use the Seaport Access Tunnel. See Section 4.2.7 Safety regarding movement of hazardous cargos on the highway facilities.

479. The construction of a Third Harbor Tunnel prior to the depression of the Central Artery will mitigate serious traffic impacts which would occur if the reverse construction sequence was followed. Impacts on the North End and South Boston would be particularly serious if a Third Harbor Tunnel were not constructed first, since the new tunnel allows cross-harbor traffic to be diverted from the existing tunnels when those tunnels are reduced in capacity from the construction activities.

480. Traffic on the Surface Artery is described in Section 4.2 TRANSPORTATION. Frequent traffic lights and on-street parking will make the Surface Artery have a city street character.

481. As stated in the FEIS/FEIR (see Section 4.4.4 Joint Development, Section 4.7.5 Effects of Ventilation Building Emissions, throughout Section 4.16 AESTHETIC IMPACTS), specific ventilation building locations and configurations will be determined during project design phases. Public participation will be actively encouraged throughout the design phases. The air quality analysis of the ventilation buildings identified the requirement for additional analysis to conform to the Commonwealth's air quality limits on emissions of nitrogen dioxide (see Section 4.7.5 Effects of Ventilation Building Emissions).

482. Modern ventilation buildings do not require a significant amount of cleaning as part of their maintenance. Any cleaning would be monitored by the Massachusetts Department of Public Works. Intake vents inside the tunnels will be cleaned of particulate matter as part of regular maintenance programs.

483. The Commonwealth concurs with the Coalition's concern: the ventilation system will be maintained as prescribed, as stated in the FEIS/FEIR. Measurements of CO were not taken under ideal conditions, and NO_x was not required to be monitored.

484. Where the term "acceptable" is used, there are no established federal guidelines or standards. Acceptable levels are determined by professional judgments based on the following two criteria:

- a. Exposure times for persons within the tunnel are short; and
- b. the levels of pollutants are similar to those seen in existing facilities (and in many instances less than existing concentrations) and there is no documentation of adverse effects given the short exposure times.

485. FEIS/FEIR Section 4.16 AESTHETIC IMPACTS describes changes in the appearance of areas adjacent to the Central Artery. As discussed in Section 4.4.4 Joint Development, the participation of local residents in

decisions about future uses and appearance of the area above the depressed Central Artery is a key component of the process.

486. The appearance of the new bridges, and their aesthetic impacts on adjacent areas, are described in Section 4.16 AESTHETIC IMPACTS. Further efforts will be undertaken during the design phase, in cooperation with MDC, BRA, and federal agencies governing navigable waterways, to achieve a more attractive bridge design which minimizes impacts on the existing and proposed MDC parks. See also Section 5.1.3 Charles River Basin Reservation and 5.1.4 Paul Revere Landing park. As is noted in the Section 4(f) Evaluation and the Section 4.4 LAND USE IMPACTS, the plans of the MDC and the BRA for this area are also in conflict.

487. The aesthetic impacts of the Preferred Alternative on the Port Point Channel are described in Section 4.16 AESTHETIC IMPACTS, and in Section 5.2.3 Port Point Channel District.

488. Ventilation buildings will be examined more closely in terms of siting and aesthetic design during the design phase; extensive community participation will be encouraged in these efforts. See Section 4.4.4 Joint Development, Section 4.7.5 Effects of Ventilation Building Emissions, and Section 4.16 AESTHETIC IMPACTS.

City Life Boston, Inc.
41 Beacon Street
Boston, Massachusetts 02108
617 723 3086

August 15th, 1983

Robert J. McDonagh
Chief Engineer
Massachusetts Department of Public Works
100 Washington Street
Boston, Massachusetts 02114

Dear Mr. McDonagh,

The proposed depression of the Expressway and the building of a Third Harbor Tunnel gives the Department of Transportation a chance to be wonderfully creative with the Federal funding which will be allocated for these projects.

It is an opportunity to celebrate the city, to give it a special identity. There is much we can learn from European cities in this regard: to make a place for people to have a carless society, to enjoy the Fort Point Channel as a calm waterway, to create allees of trees, make attractive patios, bike paths, playgrounds for small children, gardens, fountains, intimate groves. It is an opportunity to be an example to other cities who have also turned away the water and green spaces from their citizens.

Sydney Roberts Rockefeller
41 Beacon Street
Boston, Massachusetts 02108

City Life Boston, Inc.
41 Beacon Street
Boston, Massachusetts 02108
617 723 3086

The art program in the MBTA has set a precedent for the Artery and Tunnel project. The Federal Government Percent for Art in Transportation must be implemented into the construction of these projects. A system must be organized to carefully study the uses of this new land. And equally important, a Fund must be created to maintain the land and amenities once they are realized—much like the Friends of Fort Office Square and the Copsey Square Committee are doing.

This is a wonderful chance, it would be a chance to let hasty decisions allow for disappointment in the final result.

Sincerely,
Sydney Roberts Rockefeller

cc Governor Dukakis

Sydney Roberts Rockefeller
41 Beacon Street
Boston, Massachusetts 02108

City Life Boston, Inc.
41 Beacon Street
Boston, Massachusetts 02108
617 723 3086

My apologies for a hand-written letter, I have been away and not near a typewriter.

Sydney Roberts Rockefeller
41 Beacon Street
Boston, Massachusetts 02108

RESPONSE TO COMMENTS BY CITY LIFE: BOSTON INC. (August 18, 1983)

489. Federal requirements and guidelines regarding use of funds for art in transportation projects will be followed in the project.

490. See Section 4.4.4 Joint Development. The careful, appropriate, and coherent use of these newly available areas is a prime concern of the project. Participation by the public in discussions related to the use of this land will be encouraged during the design phase. Future maintenance of parcels is also briefly addressed in that section. Specific agreements will be developed in the future.

BOSTON GARDEN

NEW ENGLAND'S HUB OF SPORTS & ENTERTAINMENT SINCE 1978

August 22, 1983

Mr. James A. Walsh
Division Administrator
Federal Highway Administration
Transportation System Center
55 Broadway, 10th Floor
Cambridge, Massachusetts 02142

Mr. Robert J. McDonough, P.E.
Chief Engineer
Massachusetts Department of Public Works
100 Nashua Street
Room 530
Boston, Massachusetts 02114

B.B. FRYA-79-92-DS
Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 91, Boston, MA

Dear Messrs. Walsh and McDonough:

The following is the initial response of the New Boston Garden Corporation to the Supplement to the Draft Environmental Impact Statement/Report of the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 91, Boston, Massachusetts.

The New Boston Garden Corporation is the owner of the Boston Garden/North Station and a major tenant of the Analax Building at 150 Causeway Street in Boston.

In general, the NBGC supports the concept of a Depressed Central Artery and Third Harbor Tunnel so long as the chosen scheme provides for: 1) the continued operation of the Boston Garden/North Station; 2) good vehicular and pedestrian accessibility from all directions; 3) uninterrupted use; 4) an ultimate development which will substantially improve existing neighborhood conditions and puts the NBGC in the same or better position as it currently enjoys during and after the implementation of the proposed project.

Alternatives 1A, 5A and 6 directly affect the continued operation of the Boston Garden and unless mitigating measures are taken will cause the Garden to be inoperable.

The EIR/EIS accurately states the situation on Page 171 where it is written that: "The proposed alignment of the Third Harbor Tunnel, Interstate 90/Central Artery, will not be affected by the alignment of the proposed Central Artery. However, the ground leases 38,200 square feet of (double volume) space at the Analax Building and depends on the availability of office and storage space."

CHIEF ENGINEER
RECEIVED
AUG 23 1983

Messrs. Walsh and McDonough

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August 22, 1983

In addition, truck deliveries to the Garden pass through the Analax Building via a ramp from the Analax parking lot to the building's second floor, and then from an enclosed passageway between the two buildings. If the Analax Building is taken, relocation space and comparable delivery access must be provided for the Boston Garden to ensure that none of its operations are disrupted."

On Page 183 the EIR/EIS suggests that: "The taking of the Analax Building will require substitute space for the Boston Garden's storage and other activities which currently take place within the Analax Building. If the Garden is not replaced by a new Arena, as is proposed in the BRA's plan, this could be accomplished by construction of appropriate space in the area north of the present Boston Garden."

Should any of the proposed alternatives be implemented it is imperative that the NBGC be kept advised of the proposed location and size of the substitute space and dimensions of the threshold it is currently using at 150 Causeway Street.

In addition to acquiring a specific replacement it is mandatory that the NBGC acquire access to the Boston street system from the perimeter of this replacement building. It is via this access that the Boston Garden will have to be serviced.

Our second concern is that the preliminary designs illustrating proposed vehicular access from various directions is deficient and that our many customers will be greatly inconvenienced in trying to reach the Garden because the proposed routes are not direct.

Thirdly, while currently experiencing considerable disruption caused by the construction of the GSA building, we feel that plans must be made so that our building can continue to operate, be easily serviced and accessible during the course of construction. This means that provisions must be made so that it is possible economically to construct a new northern service and storage wing to our building prior to the demolition of the Analax Building; that temporary utilities and roads be installed prior to the demolition of existing facilities; and that disruptions of any kind be kept to an absolute minimum.

Our fourth concern is that we be made financially whole. In addition to currently making a major investment in the Garden we enjoy a twenty year lease which provides for all of our servicing, storage, and executive office space. The property which we lease is unique because it provides for servicing the arena level of the Garden which is twenty-two feet above street level. This means that everything from large semi-trailer trucks to elephants can gain direct access via a ramp and bridge to the arena floor.

To provide a substitute arrangement will be extremely expensive. We will need substantial economic and political help to accomplish this transition.

If this project becomes a reality, I would appreciate the opportunity of working with the appropriate personnel to insure that the NBGC's concerns are fully understood and that appropriate actions are implemented.

Sincerely yours,
NEW BOSTON GARDEN CORPORATION
W. A. JOHNEY
President

PAM:ms

RESPONSE TO COMMENTS BY NEW BOSTON GARDEN CORPORATION (August 22, 1981)

491. Taking of the Analex Building requires relocation space and comparable delivery access to be provided for the Boston Garden to ensure that none of its operations are disrupted. This need is acknowledged and documented in Section 4.3 RELOCATION IMPACTS of the FEIS/FEIR. Mitigating measures are also discussed in that section.

492. Access to the Boston Garden will be improved for clients coming from the north; those motorists approaching from the south will exit to Storrow Drive ramps and enter the North Station area via Loasney Way, or they will proceed northbound over the new Surface Artery from the off-ramp near the Sumner Tunnel. Traffic levels-of-service on the roadways will be slightly improved relative to the No-Build Alternative. Design modifications to the treatment of the off-ramps at Leverett Circle will be examined, with the intent of improving the connections from the northbound Central Artery to the North Station area. In addition, transit service to the North Station area, including Green Line, Orange Line, and commuter rail, is being improved under separate projects by the MBTA.



CABOT, CABOT & FORBES CO.
BUTTS STATE STREET, BOSTON, MASSACHUSETTS 02108

1000 RAND COLLEGE ROAD - WESTFIELD
MASSACHUSETTS

Mr. Robert J. McDonagh, P.E.,
Chief Engineer of Public Works
Department of Public Works
City of Boston
100 Nehemiah Street
Boston, MA 02114

Dear Mr. McDonagh:

Cabot, Cabot & Forbes has a deep interest in the proposed transportation improvements described in the Supplemental Draft Environmental Impact Statement for the Third Harbor Tunnel. The Company has developed over a million square feet of space in downtown Boston and continues to be an active participant in the downtown market. The Company is currently constructing 420,000 square feet of downtown Boston office space and owns some 23 acres across the Fort Point Channel. Our business, then, is very much affected by the substantial transportation changes discussed in the subject document.

After careful consideration, Cabot, Cabot & Forbes wishes to convey its enthusiastic support for the Modified version of Alternative 3A. We believe that this alternative, which includes construction of a Third Harbor Tunnel (I-90) and the widening and necessary response to the current and projected traffic demands in the Boston region. It is our belief that the combination of Tunnel and Harbor Expressway will provide an effective means of solving the transportation problem. Furthermore, Modified Alternative 3A offers several unique advantages: improved access to the Fort Point Channel area; Boston's increased capacity of Dorchester Avenue; more rational distribution of traffic within South Boston as a result of the seaport access alignment; and minimal disruption of the residential community near the airport.

Our support for Modified 3A notwithstanding, we do have concerns about the Congress Street-Northern Avenue connector road which traverses our property. Our concerns are summarized as follows:

Access from the Connector Road

Vehicles travelling from key origins may be unable to

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CABOT, CABOT & FORBES

efficiently enter our property from the Congress Street-Northern Avenue connector road. The overall system's ability to handle high volumes of unimpeded traffic flow along the connector road conflicts with our ability to use the connector's ability to provide efficient access to adjacent properties. To the extent that access to our parcel from the connector road is hindered, access may largely originate from Northern Avenue. It is our opinion that a single major access point for a 9.5 acre urban parcel is potentially inadequate.

Congress Street Intersection

The intersection of Congress Street and the connector road may also be a source of difficulty for vehicles seeking to make right or left turns onto the connector. Signalization may cause stacking problems both southbound and northbound, yet without signalization, traffic may not be able to be rationally distributed. In addition, it is not clear whether vehicles travelling eastbound on Congress Street will be able to make right turns onto the connector. Thus, the functional characteristics of this intersection must be clarified and evaluated.

Relationship between CC&F and Boston Wharf Company Properties

The design and traffic requirements of the connector road may cause the road to function as a barrier between the CC&F and Boston Wharf Company properties. In our view, the two properties would be best served by an urban street - that is, a street of reduced proportions that allows pedestrian activity and visual amenities. It would be our intention to evaluate such a street if relocating the connector system to the eastern boundary of our property proves feasible.

Land Planning Flexibility

The connector road, as currently located, crosses a key section of our parcel. Because we anticipate high volumes of traffic with potentially inefficient access, the siting of buildings along this road may be severely constrained as may be internal circulation patterns.

Truck Traffic

While we acknowledge the merits of Modified 3A over Alternative 3A in distributing truck traffic through the Fort Point Channel area, trucks from certain locations will still find it convenient to use the connector road to reach truck destinations off Northern Avenue, thus passing through the congested area of the Fort Point Channel. The overall distribution of truck traffic might occur if the connector system were relocated to the eastern boundary of our property.

10
CABOT, CABOT & FORBES

For these reasons, and in response to state officials' recommendations, we wish to be assisting the feasibility of relocating the connector. We wish to place an independent Congress Street-Northern Avenue connector. The scope of the study will include engineering feasibility, land planning, circulation and distribution patterns, and impact on nearby parcels. It is our expectation that the state will assist in this effort by providing us with its available base data and with periodic reviews of our work. We look forward to a cooperative relationship with the state on this matter.

We also incur with the state that the traffic impacts of the ramp system/connector road, as currently designed under Modified 5A, require further study by the Commonwealth. Specifically, traffic volumes on the connector road should be projected with distinctions drawn between truck and car traffic; the origins and destinations of such traffic should be indicated; and the effect of the connector on projected for the Connector Road should be indicated at Congress Street and at the intersection of Congress Street and the Connector Road. Further analysis of Modified 5A, we expect to see these points covered in the Final EIS.

We also wish to raise broader concerns at this time. We urge the state to consider the adequacy of access and egress between the downtown and the Port Point Channel area. The intersection of the intersection of Congress Street and Northern Avenue - will be a critical determinant of the viability of new development across the Channel. Furthermore, we share the concern of the state for thoughtful urban design. The improvements in and around the Port Point Channel area should be designed in a manner consistent with the uses, scale, and quality of the planned private development. Particular attention should be paid to the visual character of the ramp, signage, lighting, and landscaping system along the seaport access road. The treatment of this system on the seaport access road should be consistent with the treatment of ventilation towers and toll plazas, and any physical changes to the Port Point Channel itself. Finally, the Commonwealth should make every effort to minimize the disruptive effects of construction on the new development that will also be underway.

In closing, we commend the state and its consultants for their high level of performance. Within an extremely compressed time schedule, we have been favorably impressed with the technical competence displayed and with efforts to communicate with all segments of the community. Cabot, Cabot & Forbes will continue to actively participate in the planning and design review process and look forward to working with the state as this project moves forward.

Sincerely,

Ferdinand Colloredo-Mansfeld

Ferdinand Colloredo-Mansfeld

cc: James S. Hoyte
Robert T. Tierney

RESPONSE TO COMMENTS BY CABOT, CABOT & FORBES CO. (August 22, 1983)

493. Specific design of the Congress Street-Northern Avenue connector road is not yet complete. The Commonwealth will continue to work with abutting property owners and others to refine the design of this roadway; see Section 4.4.3 Preferred Alternative (re. land use).

494. The intersection of Congress Street and the connector road is currently being evaluated. Access to adjacent parcels will be a major consideration in resolution of final design issues.

495. A necessary part of preliminary design is working with interested parties to ensure the best design possible. The Commonwealth has met, and will continue to meet, with C&F to improve project design in this area. See Section 4.4.4 Joint Development for a description of this process.

496. Section 4.2 TRANSPORTATION of the FEIS/PEIR addresses the traffic impacts of the Seaport Access connector road, including traffic composition and levels-of-service on the roadway.

497. Section 4.4.4 Joint Development outlines a detailed process for establishing design guidelines and facilitating appropriate uses of newly-created joint development parcels and abutting private development parcels. This process involves a great deal of public participation, including consultation with adjacent and nearby property owners as well as public agencies and interested individuals.



ANTIQUE YACHTING ETC.

August 19, 1983

Robert J. McDonough, Chief Engineer
Mass. Department of Public Works
100 Main Street
Boston, MA 02114

Re: Comments on Third Harbor Tunnel/
Widened & Depressed Central Artery EIS
by A.Y.E., Antique Yachting Etc.

Dear Mr. McDonough:

Members of Antique Yachting Etc., sponsor of Boston's Antique and Classic Boat Regatta, are opposed to the Tunnel/Artery plan's adverse impact on the PORT POINT CHANNEL for the following reasons:

498

Negative impact on recreational boating as Channel could provide harbor for boats and marine facilities. There is nowhere for boats that travel from Maine to Florida annually to stop in Boston; they continue on by and spend their dollars elsewhere.

Lost revenue in layover stops: hotels, restaurants, marine services/repairs/supplies, other supplies, recreational shopping, tourist attractions, theatres, museums, etc.

Local boats, south shore to north shore, do not 'come to Boston' and spend their leisure dollars because there are no facilities for them.

Difficulty in having marine and water related activities in Boston, such as Tall Ships, Antique and Classic Boat Regatta, and boating events because of lack of place for participating boats. Channel could help alleviate this.

Inability to provide much needed space for ferry, commuter, waterbuses and the like to reduce the over congestion of our highways. The Channel can serve these purposes.

The aborning of a treasured asset—the waterfront and the Port Point Channel particularly— as a viable, thriving area serving aesthetic as well as functional needs.

Loss of revenue to the city and its merchants which a boating and recreational center in the Channel could engender.

401 Commonwealth Ave. Boston, Mass. 02215 (617) 262-5071

2

The Greater Boston Tourist and Convention Bureau reports that a tourist spends about \$115 per person per day (excluding hotel) in the city. According to a Maryland study in 1976, 134,000 boats registered in Maryland spent an average of \$3,731.00 per boat. Massachusetts has 170,000 registered boats plus another 100,000 unregistered boats. The state's coastline is 1,500 miles long. Massachusetts is over half a billion dollars in annual revenue from the Port Point Channel with a freshwater off flows wharf could accommodate up to 1500 boats. This would produce a respectable amount of revenue.

Last but not the least of our concerns is that 'more highways' is not the solution to our traffic problem. What is needed is coordinated efforts on several fronts: cleaner, more efficient people movers... utilization of upgraded railroads... more efficient use of existing streets... more efficient use of other non-polluting vehicles to move on existing streets on predictable schedules... water transportation (ferries, commuter boats) of varying design and power... and a ban on automobiles in the city proper.

Sincerely,

Maynard Pratt

President

RESPONSE TO COMMENTS BY ANTIQUE YACHTING ETC. (August 19, 1983)

498. Fort Point Channel has been the subject of extensive design work in order to reduce negative project impacts and provide enhancement of the area. Consistent with the Section 106 Memorandum of Agreement, there will be pedestrian access to the water's edge via a new walkway adjacent to the Channel. The project will reduce the usable water area of the Channel by approximately 9 percent, but will not inhibit its future development (for marinas or other water related uses), and may enhance them by improving accessibility to the area. The project does not restrict navigation in the Fort Point Channel. For further discussion of these issues see Section 4.4. LAND USE IMPACTS.

499. The relationship of the Third Harbor Tunnel/Central Artery project to public transit and other alternatives is discussed in Sections 1.3 and 4.2: the effectiveness of transit system improvements in meeting the transportation demand in the CBD area is discussed in Section 2.3 ALTERNATIVES CONSIDERED IN THE EIS PROCESS. Although in the early 1970's the Commonwealth's position on improving access to the CBD area was determined to focus on transit service, the Boston Transportation planning review did recommend construction of a third harbor crossing to the Airport and increased capacity on the Central Artery.

Boston Area Bicycle Coalition
P.O. Box 1015, Kendall Square Branch
Cambridge, MA
02142

August 22, 1983

Dear Mr. Walsh,

While the Boston Area Bicycle Coalition (BABC) supports the State of Massachusetts' efforts to build a third harbor crossing and the burying of the Central Artery, we feel that the Supplement to the Draft Environmental Impact Statement/Report, Third Harbor Tunnel, Interstate 20/Central Artery, Interstate 91 (DEIS/RA) fails to address several issues which concern cyclists in the Boston area. These issues are:

1. the lack of an existing harbor crossing for bicyclists and the possibility of building one into the new tunnel,
2. the impact on cyclists of the construction of the buried Central Artery in general, and the effects of the construction on the North Washington Street Bridge in particular,
- and 3. the lack of a connection between the reconstructed pedestrian/bicycle path through the Paul Revere Landing Park in the North End, and the existing Paul Dudley White bicycle paths near Leverett Circle.

Currently there is no direct way for bicyclists to cross

Boston Harbor. The construction of the Third Harbor Tunnel would present the opportunity to provide such a crossing. For example, the maintenance walkways in the tunnel could be enclosed, widened to eight feet, vented from the fresh air ducts, and thus provide a possible way across the harbor. While this is not the best solution (we feel that would be access to the MTA's Blue line), the DEIS/RA fails to address the issue at all.

B.A.B.C.

2.

The impacts of the construction of the buried Central Artery on bicyclists was also not addressed in the DEIS/RA. Of particular concern is the effect of construction on the North Washington Street Bridge. This bridge provides the only direct access to Downtown Boston from Charlestown, and is currently on the main bicycle route from Boston to East Boston and Logan Airport. Measures should be taken to keep bicycle access to this bridge open.

The DEIS/RA also proposes, as part of the construction of the Low Level Bridges over the Charles River and the new ramps connecting the buried Artery with Leverett Circle, to rebuild the existing pedestrian/bicycle path through Paul Revere Landing Park in the North End. There is no mention in the DEIS/RA of the possibility of connecting this reconstructed path with the existing Paul Dudley White bicycle path near Leverett Circle. The BABC feels that some connection, preferably a ramped pedestrian/bicycle bridge over the roadway at Leverett Circle be considered in the Final EIS.

In conclusion, while the BABC supports the efforts to build the Third Harbor Tunnel and bury the Central Artery, we feel that the issues raised in this letter should be addressed in the final version of the Environmental Impact Statement.

Yours,

Will Susman
Webb Susman,
President, BABC.

cc. Mr. Robert J. McDonagh, MD/PA
Ms. Cathy Buckley, CTPS
Mr. Frederick Salvucci, EOTC
Mr. David Bramar, JAW

RESPONSE TO COMMENTS BY BOSTON AREA BICYCLE COALITION (No Date)

500. The inclusion of a bicycle lane in the Third Harbor Tunnel would cost \$30 to \$50 million, a prohibitive cost which would require alternative funding sources other than the interstate highway fund. It is unlikely, even if funding were available, that this would prove to be feasible because of the tunnel length and ventilation requirements.

501. The project will enhance the Surface Artery and will not affect the North Washington/Charlestown Bridge. The environment for bicyclists in downtown Boston will be improved by the project. Pedestrian (and bicyclist) access will be maintained during the construction activities.

502. There is no existing bicycle path connecting Paul Revere Landing Park to the Paul Dudley White bicycle path. The primary obstacles to such a connection are the MBTA rail lines to North Station. The project would not preclude such a connection. The design of the areas affected by project ramps is being carefully coordinated with MBTA efforts to rebuild its commuter rail tracks. Landscape amenities including bike paths will be carefully considered in the coordinated planning effort. See Section 4.4 LAND USE IMPACTS for a discussion of impacts in the North Station area. MDC plans for this area do not conform with this project nor with Boston Redevelopment Authority plans for the area. During the design phase, additional efforts will be necessary to resolve conflicts amongst these plans.

The Boston Harbor associates
coastal harbor development

P.O. Box 9044 Boston, MA 02114
 Telephone: (617) 452-1255

Mr. James A. Walsh, Division Administrator
 Federal Highway Administration
 Transportation Systems Center
 55 Broadway, 10th Floor
 Cambridge, MA 02142

Mr. Robert J. McDonagh, P.E.
 100 Washua St., Room 510
 Boston, MA 02114

Reference: FHWA-MA-EIS-82-02-D5

Dear Sirs:

I am writing to offer comments regarding the supplement to the Draft EIS/EIN covering the proposed Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93 program. These comments represent a consensus garnered from many discussions among board members, affected community parties, public officials and representatives of the concerned business community.

Conclusions

1. We disagree with the FHWA determination that "the proposed action is made up of two projects". We see as inextricably linked the depression of the existing elevated Central Artery and the construction of the Seaport Access R4, and tunnel from South Boston to East Boston. We find that arguments for doing one of the other fail to stand up under empirical, economic, aesthetic and transportation analysis. The comprehensive improvement of transportation infrastructure proposed in this program would be dramatically degraded should either of the central elements not be pursued. In such a context a full reevaluation of the remaining projects would have to be undertaken.

2. We conditionally support Alternative 5A Modified, (ASAM), and oppose all remaining alternatives.

Support Conditions

1. Cost
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Support Conditions (Cont'd)

g.) The proposed Seaport Access Rd., tunnel toll plaza and tunnel approaches situated on the South Boston Flats will occupy land which by its proximity to commercial fishing and shipping facilities, is particularly valuable to these industries. The proponent should be required both to minimize the impact of the proposed roadways on these industries and to reserve resultant land and air-rights development parcels for these activities.

g.) Given the substantial difficulty of construction in the affected area around the harbor, the proponent should be required to maximize the barging of construction materials into these areas. The proponent should also be required to evaluate the feasibility of fabricating tunnel sections on the Flats area, thereby maximizing the potential for construction jobs to be filled by Boston residents and minimizing associated impacts on other coastal areas.

Conclusions (Cont'd)

3. The proposal has been a major force in the establishment of an effective "community" group concerned with the Fort Point Channel. This community group has, through its work with the proponent, substantially improved proposed designs and assisted in clearing the path to wider support for the proponent's program.

Much remains to be done to secure acceptable actual designs as well as plan for and manage the construction of these facilities. The proponent should formalize its relations with this still informal association providing for a cooperative and integrated effort to address the remaining challenges. TMSA, with the support of many of the concerned parties, is prepared to play a central facilitative role in achieving this objective.

4. The proposed replacement of the Northern Avenue Bridge with a high level fixed span structure was planned over a decade ago and long before this major highway program was even conceived. Analysis of this bridge replacement, in light of this EIS reveals that, at a minimum, the transportation conditions may so dramatically be altered by the larger program as to vacate the need for the proposed new bridge. The proponent should undertake a complete reexamination of the transportation service to be provided by the proposed bridge with an eye towards justifying its construction. Consideration should be given to amending its design to better fit its environment and satisfy the changes in land use which have been planned in the decade since its conception.

TMSA FHWA-KA-EIS-82-03-DS

Finally, we compliment the proponent on its tremendous efforts to secure a satisfactory program. We encourage the FHWA to fund and approve the program.

Thomas Ennes
Thomas Ennes, Executive Director

RESPONSE TO COMMENTS BY THE BOSTON HARBOR ASSOCIATES (August 22, 1983)

503. All of the design features of this document have been incorporated into the Preferred Alternative as presented in the FEIS/FEIR.

504. The proposed combined sewer overflow facility of the MDC is a separate project from the Third Harbor Tunnel/Central Artery project. However, to the greatest extent possible, the Massachusetts Department of Public Works and the Executive Office of Transportation and Construction will work with the MDC to speed the construction of the CSO plant. Regarding the surface treatment of the filled portion of the South Bay/Port Point Channel, see Section 4.4.4 Joint Development.

505. A pedestrian deck and walkway will be built on top of the tunnel box in Port Point Channel consistent with the Section 106 Memorandum of Agreement (included in COMMENTS AND COORDINATION). The impacts of the project on the appearance of Port Point Channel are described in Section 4.16 AESTHETIC IMPACTS.

506. The design of the tunnel could accommodate a 50-foot deep channel. This is the maximum depth ever that may be considered according to the U.S. Army Corps of Engineers (see Response to Comment No. 35).

507. Impacts on Commonwealth Flats are described in Section 4.4.3 Preferred Alternative (re land use impacts). Massport's proposed uses of this area can occur, with some modifications, following construction of the project.

508. Barging and construction of the sunken tube could not occur in Commonwealth Flats because Massport has other plans for that area. The physical requirements for a construction area would not be met well by Commonwealth Flats. Evaluation and environmental analysis of alternative fabrication sites will be performed during the design phase; a decision on steel vs. concrete tunnel sections will not be made until that time.

509. The participation of interested and affected parties in the further design of the project will be facilitated; see Section 4.4.4 Joint Development for a description of the proposed process.

510. The design of the Northern Avenue Bridge is beyond the scope of the Third Harbor Tunnel/Central Artery project. The Commonwealth is presently exploring options for that separate project as a result of public input concerning the design of the bridge.



Division Educational Marine Exchange
34 Lewis Wharf Boston, MA 02110-617-523-7641

19 August 1983

Mr. Robert J. McDonough, Chief Engineer
Mass. Department of Public Works
100 Nashua Street
Boston, MA 02116

Re: Response to Third Harbor Tunnel/Artery and Depressed Central
Artery Environmental Impact Statement by the Boston Educational Marine Exchange

Dear Mr. McDonough:

The following questions should be considered together with our general statement in the letter at the top of this letter dated 9/1/83. We appreciate the opportunity to comment on the Tunnel/Artery project and have strong feelings about its adverse effect on the Fort Point Channel, in particular.

CHANNEL

area for boats

511

o Might the project adversely affect future use of the Fort Point Channel as a place for boats?

(According to a Boston Educational Marine Exchange proposal, an elaboration of the City's plan for the Channel Port in 1977, the Channel is currently used for recreational purposes and could accommodate including 600 small power boats south of the Summer St. Bridge.

How would the various project alternatives affect this use?

Among other factors, please consider:

- Number of boats accommodated

- Appeal of the site (The number of boats the Channel could attract and its success as a marine recreational complex would, to a large extent, depend upon its physical and scenic attractiveness and attendant services and other amenities--restaurants, recreational shopping, etc.--it offers.)

o Where else on the downtown Boston waterfront could this many boats (600) be as safely and satisfactorily accommodated?

Please provide a basis for your response.

o Might the project adversely affect future use of the Channel for recreation and "breathing space"?

(The Fort Point Channel has great potential as an inner-city recreational area with a public promenade, landscaped parkland, and other amenities, as an interface between boating activity and the general public.)

512

o Where else on the downtown Boston waterfront could this many boats (600) be as safely and satisfactorily accommodated?

Please provide a basis for your response.

o Might the project adversely affect future use of the Channel for recreation and "breathing space"?

(The Fort Point Channel has great potential as an inner-city recreational area with a public promenade, landscaped parkland, and other amenities, as an interface between boating activity and the general public.)

513

Robert J. McDonough
Re Tunnel/Artery Commission

9 2

514

o What are current and projected (by year 2000) population densities of the Dewey Square/Fort Point Channel area?

o What recreational areas will be provided to meet the "breathing needs" of this increased population density?

o How will the project impact on the potential attractiveness of the Channel as a recreational area? (Please indicate aesthetic and pollution considerations, among others.)

o What would the adverse impacts of the new surface road along the downtown side of the Channel be in regard to its recreational appeal?

515

o Might the project adversely affect the Channel as a staging area for festivals?

(Pedestrian walkways around the Channel, the bridges, the water itself, and the intimate scale of Fort Point Channel present a wonderfully varied setting ground for city festivals. This has already been initiated with the Summer Solstice Festival, Harborfest, In-Water Boat Shows and, in the plan, stage, an Antique Boat Regatta.)

o How will the project's adverse visual effects, diminution of the Channel, noise and pollution from the surface roadway, construction period impacts, among other considerations, affect the attractiveness of Fort Point Channel for festivals?

o What would the cost in loss of quality-of-life for tourists, Bostonians and suburbanites be?

o What would the projected loss of revenue engendered by festival activities be?

516

o Might the project adversely affect the Channel's potential as a tourist attraction for boaters as well as landlovers?

(The Channel has the potential to be as big and even bigger tourist attraction than Quincy Market with the same boating factor a la Newport. Besides providing tourists with a marine complex for Boston, a promenade along the waterfront could provide access to sidewalk cafes, veras of artists and craftsmen and other recreational shopping opportunities.)

517

Economic factor

o Considering the Channel's potential to be a major tourist, recreational attraction for boaters and others, what might the economic loss be to the City, its merchants, the Commonwealth in the event the project precluded this development?

Please consider loss in terms of boater and land-based spending by the B:

- Per boat spending on slip, supplies, repairs, restaurants, recreational shopping, etc.

- Property taxes from marine and landside enterprises assessments

- Increased property values

- Jobs

- State sales tax on boats and goods

- Excise tax

- Other

Surface Road

- o Might not the surface road, "New Dorchester Avenue", along the downtown edge of the Channel have a deleterious effect on the Channel's potential as a boating, tourist and recreational area?

- o What would the projected loss of revenue from "missed" marine and tourist economic opportunities be?

- o What purpose(s) does it fulfill?

- o What alternatives were considered?

- o Might the project cause disruption and even cessation of lobstering and other fishing activities in the Channel?

- o What would the project cost in loss of income to the lobster and fishing industry?

- o Might the project have a negative impact on utilizing the Channel as the water transportation arm of the new South Station Transportation Center?

Water Transportation

- o Streamlined waterbuses could connect with Metrolink and bus terminals at a landing at the foot of Summer St. and speed passengers to Logan, North Station and other harborfront destinations.)

- o What would the effect of a surface road, tunnel barge and other project elements, construction period disruption, have on this potential use?

- o What would the loss in traffic alleviation be if we couldn't have this waterbus option?

- o What would be the loss in convenience to travelers using the South Station terminals?

- o What would the loss in revenue be to boat and landing operators?

ALTERNATIVE MODES

- o Why didn't the project consider alternative modes of travel to ease traffic? Airport? To downtown Boston?

- o What are the projections of increased ridership with these improvements? (Please describe incentives, disincentives against private automobile, and marketing strategies which were applied to arrive at the above projection.)

- o What is the ridership projection for an express, direct service to Logan with the elimination of the Passport bus change? If only \$2 a ride, the Logan express would be expected with the improvement? (Indicate incentives, disincentives, marketing strategies envisioned to promote increased ridership and arrive at the above projection.)

518

519

520

521

522

- o What would the corresponding decrease in private cars going to Logan/ to downtown be with "im" improvements?

Ark & Ride

- o Have satellite parking areas, strategically placed, and express buses been looked into?

- o Which have been considered? Where? (Describe contemplated nature and extent of services; incentives, disincentives, marketing to promote use.)

- o What are projections for reduced traffic to Logan? To downtown?

elin service

- o Has revived rail service to and from the South Shore along the Old Colony Line been considered? (Describe contemplated nature and extent of service as well as incentives, disincentives and marketing strategies to promote use.)

- o What is the projected ridership?

- o How does this affect projections for private car roadway use?

erry service

- o Ferry service as an alternative mode for helping to alleviate traffic was given short shrift in the EIS.

- o What is the projected ridership for ferry services from points along the South Shore for passengers destined to Logan/ to downtown?

- o What potential South Shore departure points have been looked at?

- o Number of trips/day and passengers/trip considered?

- o Does this take into account connector buses to the ferry terminals?

- o Indicate market strategies, incentives, disincentives employed to arrive at projected ferry passengers.

- o How do these projections affect use of the highways?

- o Was the question of cargo transport by ferry considered to alleviate truck traffic into and through downtown? From the South Shore? South Boston?

- o Indicate benefits to be gained by moving cargo over water.

- o What loss of commitment to improving public transportation and alternative modes will be suffered due to a policy which promises considerably greater roadway capacity in 12 years?

Policy

- o By employing all of the above suggested alternatives and others, what is the relative picture (gains and losses) we might expect in the year 2000 as to pursuing a policy which:

- encourages more private car trips to downtown and through Boston or
- discourages private cars and promotes public transportation and pedestrian sectors in the city?

524

Walter J. McDonough
As Tunnel/Artery Comments

6/11/81
5

Please consider traffic congestion, economy, aesthetics, health, and livability or quality-of-life factors in the City of Boston.

- o If the same amount of money as is being projected as the cost of the Tunnel/Artery project was to be spent instead on improving public transportation, ferry service and other alternatives to ease traffic, what could be expected building "Tunnel/Artery"? What would be the impacts of traffic congestion, parking, pollution, quality of life, etc.
- o List the benefits the project will bring to Boston and its various neighborhoods.

We would appreciate it if for each of the questions, where applicable, you would indicate the person(s)/company who provided the answer and their sources.

Where an answer is "No," please indicate reasons for this response.

We appreciate your time and effort in responding to our concerns.

Sincerely,


Pat Wells

RESPONSE TO COMMENTS BY THE BOSTON EDUCATIONAL MARINE EXCHANGE
(AUGUST 19, 1983)

511. The Preferred Alternative will not preclude the development of marina activities in the Fort Point Channel area. The project will enhance the Fort Point Channel by improving pedestrian access to the area. Section 4.16 AESTHETIC IMPACTS and Section 5.2.3 Fort Point Channel District outline impacts on the pedestrian environment. As required under the Section 106 Memorandum of Agreement, mitigating measures in Fort Point Channel will address requirements for protection of historic features and provision of open space amenities.

512. The project does not displace existing marina operations, nor does it preclude such future uses of the Channel. Examination of other potential marina sites is outside the scope of this project.

513. See Response to Comment No. 511; recreational uses of this area are accommodated and in some cases enhanced by the Preferred Alternative. Pedestrian access to the Channel area will be improved by this project.

514. Clearly, the increased daytime population in the area argues for careful design in the Fort Point Channel; this has been incorporated in the Preferred Alternative. The traffic numbers used in development of the Preferred Alternative incorporated all known development projects in the area.

515. See response to Comment Nos. 511 and 513; mitigating measures described in Section 4.16 AESTHETIC IMPACTS will enhance the use of the Channel for festivals by providing pedestrian access to many parts of the Channel which currently do not have it. Construction activities will be limited to the westerly side of the Channel, with minimal disruption of activities in the Channel.

516. See response to Comment Nos. 511, 513 and 515.

517. The Preferred Alternative will not preclude marina uses of the Channel; therefore there will be no loss of revenue (the project may even enhance such an opportunity). See Section 4.6 regarding economic impacts, both during construction and in the long-term, of the Preferred Alternative.

518. Dorchester Avenue and the tunnels under Fort Point Channel have been redesigned as a result of similar comments. No adverse recreational impacts are expected as a result of this project.

519. New Dorchester Avenue is an integral part of the Third Harbor Tunnel/Central Artery project because it mitigates local (South Boston/Fort Point Channel) traffic access and circulation problems; see Section 2.5 DESIGN CONSIDERATIONS OF THE PREFERRED ALTERNATIVE. Section 5.2.3 Fort Point Channel describes alternatives to avoid construction in the Fort Point Channel. A Section 106 Memorandum of Agreement has been executed by the FHWA, MDPW, Boston Landmarks Commission, Massachusetts Historical Commission, and the Advisory Council on Historic Preservation.

520. This project will have no effect on the fishing/loosening industries; lobster retailers displaced by this project will be relocated in accordance with the Federal Uniform Relocation Act (see Section 4.3 RELOCATION IMPACTS).

521. The project will not affect navigation in the Fort Point Channel, nor upon the ability to create a public transit dock. Rather, construction of a new deck near South Station would improve the potential for building such a facility.

522. Previous studies have shown that public transit improvements do not eliminate the problem of auto traffic to Logan Airport. The Preferred Alternative includes exclusive bus ramps linking the Airport and the Southeast Expressway with the South Station Transportation Center. The Commonwealth will continue to study and promote public transit improvements, such as those described in the FEIS/FEIR. See Sections 1.3 and 4.2 of the FEIS/FEIR for a discussion of the role of public transit in the Preferred Alternative. Old Colony service is now being examined by the MBTA.

523. Possible water transportation is described in the Draft EIS/EIR Section 4.2.9 Consequences of Other Transportation Impacts. Ferry service would not provide a sufficient alternative to a third harbor tunnel in terms of capability or accessibility; see also Section 2.3 of the FEIS/FEIR.

The Commonwealth is now operating ferry service from Hingham every half hour from 6 AM to 9 AM. Results of this experiment will be monitored carefully and incorporated into ongoing planning efforts, as appropriate.

524. See Section 1.3 for a discussion of the relationship between highway investment and transit investment.

525. For a summary of the benefits to Boston and its various neighborhoods, see the SUMMARY section of the FEIS/FEIR and Sections 4.4 and 4.5.

526. This report was prepared by consultants under contract to the MDPW and EOTF. Questions should be directed to these two agencies.

105 PLEASANT STREET - SOUTH BOSTON, MASSACHUSETTS 01760
617/633-7775

John R. Gray

August 18, 1983

Mr. Robert McDonagh
Massachusetts Department of Public Works
183 Nashua Street
Boston, MA 02114

Re: Development of Fort Point Channel Area

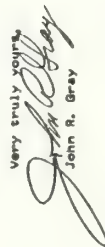
Dear Mr. McDonagh:

It has been brought to my attention that it would be advisable to send you a copy of a letter I wrote to Governor Dukakis on this subject August 5th, so a copy is enclosed.

If you should have any questions, please do not hesitate to contact me.

Thank you for your attention.

Very truly yours,


John R. Gray

EQUIPMENT FOR AUTOMATION OF MANUFACTURING & PACKAGING OPERATIONS

August 5, 1983

His Excellency Michael S. Dukakis, Governor
Commonwealth of Massachusetts
State House
Boston, Massachusetts 02133

Re: Development of Fort Point Channel Area

Dear Governor Dukakis:

I understand there is to be a hearing next week on a variety of matters pertaining to the future development of the Fort Point Channel Area. Unfortunately I will not be able to attend the hearing so I would like to express my opinions to you via this letter in the hope that it can be forwarded to those who are directly involved.

It seems to me that there are very few areas in Boston Harbor that would lend themselves to development as a combination of waterfront park area and docking space for all types of small to medium sized boats as nicely as the Fort Point Channel Area. Hence it would be an inexcusable shame if the channel were destroyed and converted into land space or used in any other manner that would prevent its development for water-related activities.

Boston sorely needs good space for marine activities, both of the pleasure and smaller commercial type, and there would be no better place to have this sort of activity develop than at the Fort Point Channel because of its proximity to such of the downtown Boston area and the restaurants, bars, transportation, and other such features as are close to the channel.

I am currently involved in an activity that illustrates the need for this kind of marine space. Next week the North American Cruiser Association will be holding in Boston Harbor their North American Championship Cruiser Navigation Contests.

The Champions from 15 different areas around the United States will be visiting here and staying at the Marriott Long Wharf Hotel for three or four days while the Championship Contests and its preceding meetings and other activities take

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place. However, the local boat owners who have volunteered the use of their boats for this International Championship Contest have no place in mind for the contest to take place at the Harbor. In fact, they are so concerned that the visitors staying at the Marriott can get back and forth between the boats and their hotel on the many occasions when that will be required during the next few days. Instead, these boats will have to be moored at various locations several miles away in Mattapan, Winthrop, Dorchester, Weymouth, and other such places.

These contests have been held in many parts of the country; they are held yearly, and this is the first time our Association has encountered a location where the boats cannot be centrally located near the point where the rest of the activities will be conducted.

I grant you that this is just one small point in the many matters that have to be considered when a project like this is under discussion. But since Boston is the only place in the country that has a harbor, it is obvious that thought should be given to closing off the only location that would really present a convenient place to marry Boston's boating interests with its downtown business facilities. I therefore urge you and others who are involved to find someplace else for the highways and tunnels that are now being considered for Fort Point Channel.

Thank you very much for your attention.

Very truly yours,

John R. Gray

JRG:js
cc: Mr. Fred Salvucci, Secretary
cc: Representative Joseph M. Connelly

RESPONSE TO COMMENTS BY JOHN R. GRAY (August 18, 1983)

527. The Preferred Alternative represents the least disruptive alignment in the Fort Point Channel area. This alignment does not preclude the development of marina activity in the Channel nor does it affect navigation in the Channel; it may even enhance the possibilities for water-related development. See Section 4.4.3 Preferred Alternative (re land use impacts). See also responses to comments by The Boston Harbor Associates and the Boston Educational Marine Exchange.

THE PAUL REVERE HOUSE THE PIERCE/HICHBORN HOUSE

The Paul Revere Memorial Association
19 North Square
Boston, MA 02113

August 10, 1983

Mr. Robert J. McDonagh, P.E.
Chief Engineer
Massachusetts Department of Public Works
100 Nashua Street
Boston, Massachusetts 02114

Dear Mr. McDonagh,

The Paul Revere Memorial Association has reviewed the Draft Environmental Impact Statement Report and Supplements pertaining to the Third Harbor Tunnel and Central Artery, and believes both the depressing of the Artery and the construction of a third tunnel will vastly improve the quality of life in downtown Boston. In addition, these projects will facilitate visitor access to the North End and will alleviate many of the commuting hardships mentioned to us by our many visitors from out of town.

Two important problems connected with the depressing of the artery must be addressed from our point of view: pedestrian access to and from the North End during construction must be protected, and detours avoided, so as to insure that the hundreds of thousands of visitors who come to Boston's best-known site be able to get here without undue difficulty. As of now, many visitors have trouble finding their way down to the North End. Because of the proposed and planned construction, we are deeply concerned that this problem could become much worse during construction on the artery between the Callahan Tunnel entrance and Haymarket Square.

Another even more distressing problem is the proposed siting of a large ventilation building at the foot of North Street. This would pose unacceptable risks to the fabric of our two houses -- the oldest remaining Federal and Colonial buildings in Boston -- the brick ventilation building could irrevocably damage the fragile wood and brick surfaces of the two houses, as well as damage the textiles, metal and wooden objects displayed in the houses. Pedestrian comfort and health, too, should be taken into account. We strongly urge that the ventilation building be located away from North Street and historic North Square.

We feel that if the two problems of access and relocating the ventilation building are addressed, the new highway system will greatly benefit the people of Boston and visitors to the Paul Revere House.

Cordially,

Patricia Sullivan
Patricia Sullivan
Director

617/523-2338



RESPONSE TO COMMENTS BY THE PAUL REVERE MEMORIAL ASSOCIATION (August 10, 1983)

528. Pedestrian access across the Central Artery corridor will be maintained at all times during construction of the project, and will be accompanied by signs and public information programs to ensure access to residents and visitors.

529. Impacts of the ventilation buildings as proposed in the EIS/EIR on air quality are described in Section 4.7.5 Effects of Ventilation Building Emissions. Air quality impacts will be modeled in detail during the preliminary design phase to ensure that air quality standards of the ventilation buildings are met. The ventilation building as proposed in the EIS/EIR to be constructed at the intersection of North and Cross Streets may be located elsewhere, depending on the results of further air quality analysis. At these locations the building could be incorporated into the design of a structure built on air rights over the depressed Central Artery in the vicinity of Commercial and North Streets; see Section 4.16 AESTHETIC IMPACTS.

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Robert Tierney, Commissioner
Page Two
August 10, 1983

also add aesthetically to the City of Boston.

In addition, a comprehensive rapid transit policy should be developed and implemented, not just for the Boston area, but for the Commonwealth to assist in alleviating a major problem of traffic congestion with its attendant environmental effects.

Very truly yours,
Nicholas Contos
Nicholas Contos

NC:heb

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C 2244

NO NAME RESTAURANT, INC.
15-1/2 Fish Pier
Boston, Massachusetts 02110

August 10, 1983

Robert Tierney, Commissioner
Department of Public Works
Commonwealth of Massachusetts
100 Nashua Street
Boston, Massachusetts 02114

Dear Commissioner Tierney:

Regarding the proposed Third Harbor Tunnel, I-90 Central Artery and I-93 projects, I feel that as a taxpayer and property owning businessman in Boston, I must express my thoughts and concerns.

I oppose the tunnel projects because I feel that they serve to relocate a traffic congestion and parking problem from the south and center of Boston to the north of Boston, which is the turning focal point of the city. There is no additional parking lots created, even more air and noise pollution in the neighborhoods through which they pass.

It is stated that "scheme 5A" creates six acres of air rights. However, these rights are being created from very valuable land which is presently in various stages of development by private investors. The area of South Boston is a residential area, a prime location for the relocation of Boston's business and commercial district. The air rights as an adjunct to the tunnel construction are valuable, but they serve to reduce the potential for development that presently exists in the affected area while adding considerably to the construction costs to adapt to the restricted nature of air rights development. In addition, not all of the land to be acquired for the project will be suitable for air rights development and thus much land is lost from Boston's tax rolls.

As an alternative to tunnel construction, I feel a passenger ferry system should be brought back to Boston, to bring people not only to East Boston, but to other waterfront communities. This system is very successful in other waterfront cities such as San Francisco and Seattle. It will

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RESPONSE TO COMMENTS BY NO NAME RESTAURANT, INC. (August 10, 1983)

530. Relative to the No-Build Alternative, construction of the Preferred Alternative will reduce air and noise pollution in South Boston, the Waterfront, the North End, and East Boston in the long term; see Section 4.7.2 Microscale Analysis and Section 4.8.1 Noise. Traffic will be reduced on most local streets as a result of the improved capacity of operating conditions on the Central Artery. With the No-Build Alternative, severely congested conditions will result in increased diversions of traffic from the regional facilities to the local roadways in an attempt to bypass the congestion on the Artery. The result will be increased congestion on local roads, increased air pollution, adverse safety impacts, and degraded quality of life (see Section 4.2.2 Traffic Volumes). As indicated in Section 4.2.10 Parking Impacts and discussed further in Section 4.4 LAND USE, parking displaced by the project under the viaduct (on the Surface Artery and Atlantic Avenue, plus in surface lots) in the North End and Waterfront areas will be replaced prior to their loss by construction activities.

531. Alternative 5A has been modified and is the Preferred Alternative. The six acres of air rights referred to in this comment have been removed: the project does create approximately 20 acres of air rights in the Central Artery corridor. Impacts of the Preferred Alternative on land use in the project area, including South Boston, are described in Section 4.2.3 Preferred Alternative (re land use impacts) and impacts on property taxes are described in Section 4.6.5 Development and Related Fiscal Impacts. The project has major positive impacts on development opportunities and (hence tax revenues) in the City.

532. Possible water transportation is described in the DEIS/DEIR Section 4.2.9 Consequences of Other Transportation Improvements; ferry service would not provide a sufficient alternative to a Third Harbor Tunnel in terms of capacity or accessibility. Section 2.3 of the FEIS/FEIR discusses the various alternative transit improvements considered in the EIS/EIR process, and notes specifically the importance of transit service, including ferry service, as a complement to the regional highway system for access to the CBD area. The Commonwealth is continuing to improve public transportation services in the region, regardless of the Central Artery/Third Harbor Tunnel project. The Preferred Alternative also promotes public transit by providing direct bus ramps linking the South Station Transportation Center with Logan Airport and with the Southeast Expressway.

533. While the scope of the Third Harbor Tunnel/Central Artery EIS does not include the development of a comprehensive rapid transit policy, the Commonwealth will continue to explore transit improvements independently of the project. Moreover, certain transit improvements will occur in conjunction with the project. For example, a major new bus service to South Station and a segment of a downtown distribution bus lane for western corridor bus service will be based on project facilities; see Sections 4.2.9 and 1.3.



East Boston Harbor Community School
717 Vermont Street
East Boston, Massachusetts 02128
617-4800

UTILITY SERVICES
PROPERTY MAINTENANCE
CITY ACTION, INC.
8-400

August 9, 1983

POSITION STATEMENT

Subject: Third Harbor Crossing

On behalf of the East Boston Harbor Community School Council, Inc., I wish to express our opposition to the Third Harbor Crossing. It is the thinking of the Council, that the East Boston Community cannot tolerate the addition of another Harbor Crossing.

The community will be severely impacted in the areas of public safety and health as a result of increased residential spill-off and Massport business related traffic. The study documents do not indicate any precautionary measures or design elements that address this issue.

Health, again will be jeopardized as increased ventilation exhaust will add to the already existing poor air quality. Again, no guarantee that this will not happen.

In regards to the economy, we feel that the State and Federal government could better spend our tax dollars on a traffic and infrastructure plan that maximizes the use of a number of positive alternatives, such as improvements in the Central Artery, improved public transportation, permanent

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Page 2

Position Statement - Third Harbor Crossing

one way tolls and an extensive ferry network.

On the issue of jobs, it has been reported that a number of smaller projects/alternatives will increase the number of jobs and will spread the wealth throughout the Community.

Finally, the East Boston area was once all residential, now the residents of the Community are left with the smallest percentage of residential and recreational areas. Our Community cannot take on the burden that the Harbor Crossing will create and impact we are afraid that if the crossing is constructed, it will lead to the end of quality residential life.

These criticisms reflect our concern for each of the alternatives and we would like to see each of the presented issues addressed in the EIS/EIR Final Report.

We strongly urge our political leaders and officials to reject the development of the Third Harbor Crossing and instead represent the Community's concern and quality of life.

Thank you,

Paula Graville
Paula Graville
Chairperson

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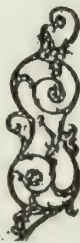
RESPONSE TO COMMENTS BY THE EAST BOSTON HARBOR SIDE COMMUNITY SCHOOL
(August 9, 1983)

534. In general, traffic on residential streets in East Boston will decrease as a result of this project; see Section 4.2.2 Traffic Volumes. Land Use impacts caused by the project are discussed in Section 4.4 LAND USE. A concern of the community of increased Airport activity and its potential spillover to off-airport areas must be addressed. Although the Airport will continue to increase its level of activity with or without the project, a land use/zoning study is identified in the FEIS/FEIR as part of the total mitigation effort for the Preferred Alternative.

535. Overall, air quality will be improved in East Boston as a result of this project; both CO and NO₂ levels will be reduced in most instances relative to the No-Build Alternative (see Section 4.7.2 Microscale Analysis and Section 4.7.3 Effects of Toll Plazas).

536. The job generation potential of this project, locally and regionally, is addressed in Section 4.6 ECONOMIC IMPACTS. No analysis of the job generation potential of a series of small projects was performed as part of this project. However, as noted in Section 4.6, the Preferred Alternative will generate approximately 77,000 person years of employment during the construction period.

537. The findings of this study indicate that the Preferred Alternative will be beneficial to the residents of the East Boston community; see Section 4.5.3 Preferred Alternative (re neighborhood and community facilities impacts).



SOUTH END HISTORICAL SOCIETY, INC.

August 9, 1983

Mr. James A. Walsh
Division Administrator
Federal Highway Administration
Transportation Systems Center
55 Broadway, 10th Floor
Cambridge, MA 02142

Mr. Robert McDonagh, P.E.
Massachusetts Department of
Public Works
100 Nathan Street, Room 530
Boston, MA 02114

Gentlemen:

The South End Historical Society fully supports the proposed depression of the central artery.

The South End Historical Society tentatively supports the proposed Third Harbor Tunnel Plan is, provided that the following additional changes are made in the street and traffic patterns to preserve the residential nature of the South End, which is the largest extant Victorian residential neighborhood in the United States:

1. Herald Street should be the only traffic route between the Back Bay and the Third Harbor Tunnel and the South End. The street should be widened to the East. East Berkeley Street as the chief access route to the Back Bay from the Southeast Expressway. The access ramps to the Southeast Expressway should be restructured accordingly.
2. Access to the Southeast Expressway at Berkeley Street should be eliminated to make it impossible to enter the Southeast Expressway by driving through the South End.
3. The Massachusetts Avenue interchange should be restructured to provide four lanes of southbound traffic and adequate truck access between Roxbury and South Boston.

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Mr. James A. Walsh
Mr. Robert McDonagh, P.E.

Page Two
August 9, 1983

The South End Historical Society believes that these three changes in the traffic patterns are essential to prevent the proposed Third Harbor Tunnel from inadvertently congesting the South End with commuter traffic and illegal parking.

Sincerely yours,

Evan Fox
Evan Fox, President

SP:dvw

cc: The Honorable Michael S. Dukakis,
Governor of the Commonwealth of Massachusetts
Frederick Salvucci, Secretary of Transportation
James Hayes, Secretary of Environmental Affairs
Robert Ryan, Director of Boston Redevelopment
Authority
Richard Curran, Deputy Director of Boston
Redevelopment Authority
John Vitagliano, Traffic Commissioner of the
City of Boston

RESPONSE TO COMMENTS BY THE SOUTH END HISTORICAL SOCIETY, INC. (August 9, 1983)

538. As requested by the South End community and others, the Herald Street Extension will serve as a major access route to the Back Bay from the Southeast Expressway, and the off-ramps from the Third Harbor Tunnel will lead directly onto Herald Street Extension rather than onto Albany Street as in the previous alternatives. The access ramps to the Southeast Expressway from the Massachusetts Avenue area will not be changed as part of this project.

539. Final determination of the direction of East Berkeley Street will be determined in cooperation with the City's Traffic and Parking Department.

540. Modifications to the Massachusetts Avenue interchange are outside the scope of this project. Improvements to the Southeast Expressway are being undertaken separately by the Massachusetts Department of Public Works. However, it is planned to provide four lanes of southbound highway capacity in this area.

TEL. 0441 100-0013

July 29

200125 RUSSON DOT

Re: Central Issue

Page 212

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Journal of Business Communication 36(4)

Page 2 of 2

ational information will be made

Yours truly,

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CC: SAC, JAMES S. BOYCE

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----- NO COMMENTS BY THE OTHER COMMISSIONERS (7.1.70 1997)

These measures will require

project on air quality. In most cases, air quality will improve as a r

direction flow of traffic. Given the potential impact that this project holds for neighborhoods residents, it is imperative that public information is clear and understandable. The consultants have failed to provide for these two criteria and remains deficient of its responsibility to adequately inform the public.

With regards to the "SA modified plan", there exists some specific areas of the proposal which I find detrimental to the South Boston community.

The Dorchester Ave. extension as proposed is an incentive for even greater numbers of cars and trucks to use South Boston as an alternative to the Southeast Expressway. The DEIR provides no information about projected road capacity or traffic speeds on this extension. Also absent is any analysis of the impact this extension will have in the Broadway-Dorchester area. In addition, the extension will require the relocation of residential structures. The advantages of this extension appear to be only for Boston-bond commuters.

The construction period and its related activity are dealt with superficially in the DEIR. The report mentions the closing of the West 4th Street, Broadway and Summer Street bridges. The report fails to outline the duration or scheduling of these closings. All are then one South Boston bridge and one Dorchester bridge. This is lined with the rest of the state through a series of bridges. The closure of even one bridge, as currently experienced by the Columbus Circle bridge repairs, is a serious disruption to the ability of neighborhood-residents to travel in or out of the community. Emergency vehicles, such as fire apparatus, would be seriously hampered in the event of a major catastrophe. Also deficient in the DEIR is a clear presentation of construction-related noise and traffic pollution. In particular considering that pile driving and pneumatic tools are exempt from Boston's Noise Code regulations, the potential for hours of noise and traffic pollution is considerable. These issues absent from your presentation need to be analyzed and available for community evaluation.

The SA modified plan indicates the placement of a toll booth and 2 ventilator building in South Boston. Nowhere in the DEIR is there a discussion of the type and quantity of pollution emissions that can be expected from these structures. Also questionable is how traffic on the airport access road, which is virtually a major Interstate highway, will be able to reduce traffic speeds on this major street or roadway to accommodate a toll booth. This design seems to lend itself to a high risk of traffic accidents.

Access to the Third Harbor Tunnel is a major concern of the South Boston community. While it is positive that SA modified would allow only west-bound traffic at the lower Northern Ave. and Summer St. ramps, the access ramps further north on Summer St. will negate this benefit. If these ramps allow access to Logan Airport, then South Boston can expect to continue to experience ever increasing traffic utilizing the street as an alternative route to the Southeast Expressway. The South Boston community must be eliminated. The SA modified plan as proposed would certainly exacerbate this problem.

As a final comment, I am disturbed by the absence of any cumulative evaluation of the impact of the pending Fort Point Channel project. In addition to this project, South Boston is confronted with proposals for Boston Edison coal conversion, and

construction of major hotels, commercial centers and industrial complexes. The cumulative effect of these projects must be examined. No single proposal can be viewed in a vacuum. The state must evaluate how each of these projects will interact with each other. The preservation of South Boston as a stable residential area is at stake. The Commonwealth must insure that the economic benefits to be realized by these initiatives do not outweigh the value of inner city neighborhoods. Determining the consequences of these developments requires comprehensive planning, evaluation and effective public communication.

I most strongly request that your department address and respond to the issues I have raised. Given the deficiencies of the existing DEIR and the problems inherent with the SA modified plan, I am at this time opposed to this development. It is my hope that the Committees of Transportation, Public Works, and Environmental Affairs will demonstrate a sincere commitment to work with all of Boston's neighborhoods to develop alternative solutions to Boston traffic problems, solutions that do not sacrifice neighborhoods in the process.

Sincerely,

Michael Taylor
Michael Taylor
88 G Street
South Boston, MA 02127

RECEIVED
BOSTON CITY COUNCIL
SECOND DISTRICT
August 22, 1983
Mr. Robert McDonough
Chief Engineer
Department of Public Works
100 Nassau Street
Boston, MA 02114

August 22, 1983

Dear Mr. McDonough,

I am a lifelong resident of South Boston, a parent, a homemaker, and a candidate for the District II City Council election. As such, I am compelled to express my opposition to the proposed Third Harbor Tunnel and Expressway project. I have reviewed both the DEIR and the SA modified plan. I have also reviewed the public information project. I have reviewed both the DEIR and the SA modified plan. I have also reviewed the public information project. I have reviewed both the DEIR and the SA modified plan. I have also reviewed the public information project.

The foremost question that comes to my mind is: how will this project benefit South Boston? It is readily apparent that commuters into Boston and commuters component of this project will benefit tremendously. However, the impact on the neighborhood of this project will be increased traffic, pollution and disruption of neighborhood life due to construction activity are the only "guarantees" that Bostonians can expect.

I remain in suspect of the premises upon which this proposal was developed. The method of traffic forecasting included in this plan is unknown to me. Has this methodology improved substantially over that which forecasted travel capacity for the present Central Artery? What assurances does South Boston have that twenty years in the future will not propose expansion of the Central Artery? The question of why expansion of the public transportation system was not considered a primary alternative? Is it sound public policy to encourage increased motor vehicle traffic? Certainly not for the residents of Boston. This proposal will increase access to Logan Airport and will stimulate expansion of that transportation center. Thus, Bostonians can anticipate not only increased vehicular traffic but also increased air traffic as well. These results promise only further disruption to community life for Boston neighborhoods.

Furthermore, I am critical of the manner in which information was presented to the general public. It is apparent that the Commonwealth, through its project consultants, is strongly supporting only one plan, SA modified. Yet the components of this plan were lost in the public presentation amongst the maps and charts of five alternative plans. The reading materials and the maps contained therein are equally confusing and require careful reading to determine the location of access points, tunnels and the

CAMPAIGN HEADQUARTERS
487 East Broadway, South Boston, MA 02127 358-6403

543. The traffic model used for the study was the WPS Battery of traffic assignment programs of the U.S. Department of Transportation. This is a "state-of-the-art" traffic modeling process used on most federal highway projects. It is not the same model used to forecast traffic for the original Central Artery. See Appendix 4 TRAFFIC (Draft EIS) for a description of the model. In summary, however, the traffic model has two basic elements - a computerized representation of the highway system or network, and a trip table (matrix). For the average weekday traffic forecasts, this highway network extended to just beyond Route 128, and included all major and minor arterial routes and most local streets in the downtown area (11,000 links and nodes). For peak hour traffic assignments, the highway network was somewhat smaller, extending about halfway out to Route 128.

The area within Route 128 is divided into 217 zones. The trip table identifying the number of vehicle trips from one zone to another zone has been established, based primarily on the 1977 Central Artery Origin-Destination Survey performed for the MDPW as part of the studies for improvements to the Central Artery, and extrapolation based on anticipated population and economic activity. Traffic from beyond Route 128 is considered to enter or leave the network from external zones.

544. Traffic analysis was projected to the year 2010. The project would be designed to accommodate the year 2010 trip making characteristics of the area.

545. See Section 1.3 MAJOR POLICY ISSUES in the FEIS/PEIR regarding mass transit alternatives and a general transportation policy overview. Mass transit improvements alone cannot solve access problems in Boston. The Preferred Alternative provides improvements for bus transit service by the exclusive bus ramps, and also improving traffic flow on the regional highway facilities.

546. At the informational meetings and public hearings on the Draft and Supplement to the Draft Environmental Impact Statement/Report, the Commonwealth was required by law to present the impacts of all the alternatives under examination. The Commonwealth concurs that this does make it difficult to focus on specific design details. Responses generated from the public on the various alternatives contributed to a determination of the Preferred Alternative. Many staff people were available at the meetings and hearings to answer questions about the alternatives.

547. The provision of a Seaport Access alignment tunnel and an improved Central Artery will reduce the number of vehicles using South Boston streets to bypass congestion. Traffic on Dorchester Avenue south of the Herald Street Extension decreases with the Preferred Alternative; see Section 4.2.2 Traffic Volumes. Also, as indicated in Section 4.2.2, the effects of the project in the Broadway/Dorchester Avenue intersection, as well as on about 100 other links and intersections, are presented in Tables 30 and 31.

548. See Section 4.1.3 Maintenance of Traffic and Existing Utilities for a discussion of the construction staging assumptions, and Section 4.2.9 Construction Impacts in the Transportation Impacts section for a qualitative discussion of the traffic impacts during construction. The West 4th Street Bridge will be rebuilt prior to the project; Herald Street Extension can be built prior to closing Broadway Bridge.

549. See Section 4.7.6 Construction Impacts (Air Quality) for a qualitative discussion of air quality impacts during construction, and Section 4.8.1 Noise for a qualitative discussion of noise impacts during construction. Additional construction period traffic and air impact analyses will be done during the design phase, when detailed detour plans and staging plans are available, to identify and mitigate potential air quality violations.

550. Additional detailed air quality analyses have been performed for the Preferred Alternative, and is presented in Section 4.7 AIR QUALITY IMPACTS. The effects of the ventilation buildings are also discussed in that section.

551. Roadway design and appropriate signing will assure the safety of motorists approaching the toll facility. The toll plaza will only serve motorists entering from the East Boston side of the harbor, since tolls on the outbound direction will not be collected. The design is consistent with appropriate travel speeds.

552. There is no access from Summer Street to the tunnel to Logan Airport. Access is allowed from Congress Street and the Service Road to Northern Avenue.

553. Traffic forecasts include development proposals in South Boston. See Section 4.4.3 Preferred Alternative (re land use impacts) for the project's land use effects on these proposals. The cumulative effects of these individual projects on South Boston and on each other is beyond the scope of this project; such an evaluation should be found in the environmental impact examinations for the individual development proposals.

Mr. James A. Walsh
Division Administrator
Transportation Systems Center
55 Broadway, 10th Floor
Cambridge, Massachusetts 02142

Mr. Robert J. McDonough, P.E.
Chief Engineer
Massachusetts Department of Public Works
100 Washington Street
Boston, Massachusetts 02114

RE: Depressed Central Artery EIS Supplement;
Impacts on North Station Order Renewal Plan

Dear Gentlemen:

The North Station Project Advisory Corporation is a group of citizens who have been organized as the official project advisory committee (PAC) under State urban renewal statutes for the North Station Urban Renewal Project. Most of our members have been residents or businessmen in the North Station area for twenty or thirty years or more and have witnessed first hand the decline and stagnation of the area over the years. We know that this decline is a waste of the enormous potential the area has and we have been long convinced that this stagnation is not in our common interest. We believe that the current situation is not in our common interest and that the area needs a new impetus and highways neither private enterprise nor government programs have been able to make a fundamental change in the vitality of the area. Hence, it was with great enthusiasm that area supporters welcomed the bold commitment of the City to undertake the redevelopment of the area and to seek the location of a new Federal office building into the North Station as the initial catalyst of the project.

For the past three years we have worked closely with the Boston Redevelopment Authority in the planning and implementation of the North Station Urban Renewal Plan. We unanimously support the goals of the plan which are: encourage a sound, integrated mixed use development; promote higher economic land uses through joint public/private action; and remove blighting influences of the transportation infrastructure, obsolete buildings and outdated development patterns. Through our participation we have been sensitized to the need for a high quality government action program to meet the needs of the North Station area. We are convinced of the importance to the regional economy of solving the "central artery" problem. While we are supportive of the central artery proposal in general we feel very strongly that in the North Station area it is fundamentally contrary to the goals of the urban renewal plan. At

Page 2
Letter to: Mr. James A. Walsh, Mr. Robert J. McDonough, P.E.
Re: North Station Project Advisory Corporation

North Station so that it is more compatible with the North Station Urban Renewal Plan and better addresses the issues raised below. It could be even more fruitful if joint planning could be undertaken with the Boston Redevelopment Authority and the North Station Project Advisory Corporation to produce a new plan which successfully integrates development and transportation goals.

Some of our specific concerns with the current central artery proposal are outlined below:

1. The plan maintains the elevated Storrow Drive connector ramps which is a major barrier and blighting influence. Unfortunately in its current and proposed location it bisects the project area. The new proposal affects additional land area negatively because of its configuration and elevation as it connects with the central artery. If the elevated ramps must stay more detailed planning is necessary to insure a workable relationship with several major elements of the development plan.
2. The proposed central artery is a much more intrusive presence at North Station than the current artery. We view this as being very detrimental to the kind of environment necessary to promote higher economic uses of land in the project area. The proposed plan is far more intrusive because of the increased traffic lanes, the ramp configuration, the horizontal separation of the north and south lanes and the lack of a central artery. The proposed plan is far more intrusive because of the loss of the option of bringing water into the interior of the project area.
3. The transition of the central artery from below grade to elevated above grade occurs at the North Station and results in a major visual and functional barrier some 1000 feet or more long. This has adverse implication for servicing the proposed area, for continuity of the riverfront treatment, and for knitting the North Station development into the neighborhood to the east.
4. The proposed Storrow Drive connector tunnels must be planned in conjunction with the treatment of the riverfront. From the level of detail of the proposed plan one is unable to determine whether the tunnels can coexist with appropriate maximum utilization of the river and riverbank tunnels limit. We are deeply troubled by the proposed treatment of the river and riverbank tunnels limit. We are deeply troubled by the proposed treatment of the river and riverbank tunnels limit. We are deeply troubled by the proposed treatment of the river and riverbank tunnels limit.

Page 3
Letter to: Mr. James A. Walsh, Mr. Robert J. McDonough, P.E.
Re: North Station Project Advisory Corporation

4. Continued

We also are concerned that all traffic coming from the south side of the artery accessing the Massachusetts General Hospital and the North Station area will have to enter into the already busy Charles Circle area.

In sum, we strongly believe that depressing the central artery needs to be viewed by the State as an opportunity at North Station to remove the blighting effects of the present network and to plan a new network which facilitates the redevelopment of the area. We hope our constructive suggestions will be useful in redefining the parameters for subsequent planning of the project. We stand ready to participate in the planning effort in any way which will bring improvements to North Station.

Very truly yours,

Samuel Edelstein
Samuel Edelstein
President

cc: Kevin E. White, Mayor
Robert J. Ryan, Director, BMA
E. Owen Donnelly, Senior Project Coordinator, BMA

RESPONSE TO COMMENTS BY NORTH STATION PROJECT ADVISORY CORPORATION (undated)

554. Future plans for the North Station area and the design of the Central Artery depression will be coordinated during the preliminary design phase. The MDPW recognizes that conflicts between the Preferred Alternative and the BRA (and also the MDC) plans for the area need to be resolved before the ambitious highway improvement is constructed. As stated in Section 4.4 LAND USE IMPACTS and in Chapter 5.0 SECTION 4(f) EVALUATION, continued coordination efforts with the BRA, the MDC, the MBTA, and the public (including the North Station Project Advisory Corporation) are essential to the successful implementation of the project. These efforts will continue during the design phase.

555. See Section 4.4.3 Preferred Alternative (re land use impacts), Section 4.16 AESTHETIC IMPACTS, and Sections 5.1.3, 5.1.4 and 5.1.4 in SECTION 4(f) EVALUATION for a description of impacts and mitigating measures in this area. In addition to the extensive coordination required to develop a single plan for the area, a number of aesthetic and pedestrian-oriented measures will be included in the project, including a pedestrian walk along the river, a noise barrier adjacent to the new access road to the Charles River Dam, increasing the size of the public areas in this part of the City, etc. These measures will be pursued further during the design phases of the project.

556. The traffic implications of the project on Leverett Circle have been evaluated as part of this FEIS/FEIR. As indicated in Section 4.2 TRANSPORTATION, traffic in Leverett Circle will be slightly reduced with construction of the Preferred Alternative; the Circle will operate at level-of-service D or E. Traffic on Storrow Drive will not be significantly affected by the project.

East Boston Fair Share

758 Saratoga Street, East Boston, MA 02128
Phone: 569-8930, 288-7400

August 8, 1983

FHWA
Mr. James A. Walsh
Division Administrator

and

MDPW
Mr. Robert W. McDonough, P.E.
Chief Engineer

Re: Third Harbor Tunnel, Interstate 90/Central Artery/
Interstate 93, Boston, Massachusetts
Comments on MPEA-SDEA No. 4325

Dear Sirs,

After reviewing the DEIS/DEIR and the SDEIS/SDEIR we have prepared the following comment for your review according to the comment letter submitted to FHWA (MPEA) dated No. 4325 and hereby submit them for consideration and response.

Our position is also that of the Coalition Against a Third Tunnel and we will not at this time reiterate those concerns. However, two issues have come up of late which warrant further investigation. As the Administration is lobbying for the support of the business and labor communities, the position has been taken that the Third Harbor Tunnel, Interstate 93 Project, is our understanding that the Third Harbor Tunnel EIS/R faces a September 30 completion deadline. It is also our understanding that the repair or reconstruction of the existing Artery has no timeline and may require further review and study. We would appreciate a clear position from the Federal Highway Administration on the connections between funding for the Central Artery Project and the proposed Third Harbor Tunnel.

We are also distressed that the public hearings on the Draft Environmental Impact Statement/Report for a Depressed and Widened Central Artery/Third Harbor Tunnel Project are being held in Faneuil Hall. Faneuil Hall is completely without handicapped accessibility, this gross discrimination against disabled people is unwarranted. It prevents a section of Boston's population who will be greatly impacted by the adverse effects on public transportation, with a decline in ridership and subsequent decline in revenues, from reviewing materials and information about the proposed projects.

We hope these comments will be considered and acted upon as deemed necessary. A third harbor tunnel not only adversely affects East Boston but all of Boston's working class neighborhoods. The needs for a balanced transportation system that moves people and goods faster and louder, but such a system must focus on also reducing the volume of traffic.

For a Fair Share,

Angela Bolognese
President

RESPONSE TO COMMENTS BY EAST BOSTON FAIR SHARE (August 8, 1983)

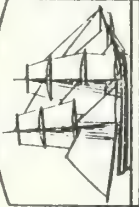
557. See responses to comments by CAT. (Response No. 412 to 488).

558. This PEIS/FEIR, covering both the Artery depression and Third Harbor Tunnel, was submitted to FHWA on September 30, 1983 thus satisfying the federal deadline for environmental review of proposed "interstate gap completion" projects. Resolution of specific funding eligibility issues, in contrast to environmental issues, must necessarily await completion of the environmental review process, which weighs the potential environmental benefits of alternatives studied against their environmental impacts in order to determine whether the project warrants serious consideration for implementation. Environmental law requires, in fact, that study of alternatives at the EIS stage not be limited to options known to be fundable. In the case of the proposed Central Artery/Third Harbor Tunnel project, the FHWA will first review the EIS and, if that is approved, will proceed to determine funding availability and priority for the project under applicable federal highway programs. With the publication of this final EIS/FEIR, the Commonwealth has selected as its preferred alternative a project which includes both the widening and depression of portions of I-93 and the extension of I-90 to East Boston. The preferred alternative is thus one project, with two sub-elements.

559. MDPW personnel specifically assigned to assist the handicapped were on duty at Faneuil Hall during the entire Public Hearing and did assist any handicapped persons who requested assistance. Persons unable to attend the Public Hearing in Faneuil Hall could make written comments on the documents which are included as part of the public record. Attendance at the hearing was in no way a prerequisite to making comments on the documents. Public information meetings which provided information about the project were held in locations that are accessible to handicapped persons (Quincy Community School, Harborside Community School, Christopher Columbus High School, Marriott Long Wharf Hotel, and South Boston Public Library). Statements in this comment regarding the project's effects on transit service are discussed in Section 1.3 MAJOR POLICY ISSUES and Section 4.2.3 Other Transportation Facilities. As noted in those sections of the PEIS/FEIR, the project will not adversely affect public transit service in the CBD.

BARBARA J. ATTANASI
Director

August 22, 1983



**Boston
Tea Party**
Ship & Museum
Congress Street Bridge
Boston, Mass. 02210
(617) 338-1773

MR. ROBERT J. McDONAGH, P.E., Chief Engineer
Massachusetts Department of Public Works
100 State Street, Room 30
Boston, Massachusetts 02114

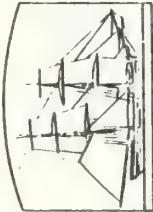
Dear Mr. McDonagh:

On behalf of the Boston Tea Party Ship & Museum I wish to comment on the June, 1983 Supplement and the original November, 1982 Draft Environmental Impact Statement/Report on the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93, Boston.

Unless improvements are made to increase traffic capacities of the Central Artery, and more direct access to Logan is available, traffic congestion in Boston will continue and worsen. An improved Central Artery in conjunction with a traffic tunnel will decrease this congestion and improve traffic flow. Boston needs a sound traffic planning and development of the Central Artery Depression with Third Harbor Tunnel via Seaport Alignment plan - Alternate 5a - Design Modification.

Recognizing a change must occur to remedy this traffic situation, Alternate 5a Design Modification appears to be the solution. Alternate 5a Design Modification addresses the congestion problem by eliminating the old Central Artery, significantly disrupting the Port Point Channel. This plan eliminates the extension of the new Dorchester Avenue beyond Congress Street Bridge, therefore not encroaching on the Channel.

Alternates 3, 3a, 5, 5a and 6 will encroach on the Channel significantly decreasing the development potential of the



area for public and private use. The Channel must remain active in order for its historic values to be addressed and its development possibilities realized. These alternatives do not allow for future Channel growth.

Since the Tea Party is moored in the Channel, the impact of construction of the Third Harbor Tunnel for the Central Artery will severely affect business. Our survival depends on direct access via foot, car or motorcycle. Because of this tunnel/artery construction, traffic congestion in and around the area will increase. Bridges on the channel will be closed making the Tea Party inaccessible to vehicles and pedestrians. Our business will greatly suffer without direct access. Also, being an outdoor operation other construction impacts on the Port Point Channel will affect the quality of air and noise, especially noise, may virtually cause the Tea Party to close.

In light of the significant charges ahead to decrease traffic congestion and improve traffic flow, I suggest the plans for the Northern Avenue Bridge be reconstructed to be a movable, lift span type which allows access to masted vessels in order to improve Cuck and clear the way for the new bridge. With the new bridge, this problem will be remedied and a new solution for the Northern Avenue Bridge should be proposed.

The Boston Tea Party Ship & Museum, moored at the Congress Street Bridge since 1973, is visited by over 180,000 people annually. The site, a gift shop, museum and ship is open daily year 'round. Our visitors come from all over the country and the world. Since we have been in the area around us for 10 years, we have been visited by the Museum, the Russian Consulate and soon, the Computer Museum. The Neighborhood is working together to enhance the quality of the area around the Port Point Channel.

In your ongoing design and planning process I urge you to continue addressing the needs and concerns of all regions affected by the Third Harbor Tunnel/Central Artery development, especially the Port Point Channel. The Alternates in the June Draft Supplement show encouraging improvements for previous plans for the tunnel/artery improvements. We will continue to work for the best possible outcome for all traffic to and from the Port Point Channel and it will allow direct access and visibility to the Tea Party Ship.

Sincerely,
BOSTON TEA PARTY SHIP & MUSEUM

Barbara J. Attanasi
Barbara J. Attanasi

BJA/SHA

RESPONSE TO COMMENTS BY BOSTON TEA PARTY SHIP AND MUSEUM (August 22, 1983)

560. The Congress Street, Summer Street and Northern Avenue Bridges will be open at all times; therefore, vehicular and pedestrian access to the Museum will be available. See Section 4.1 DESCRIPTION OF CONSTRUCTION and Section 4.4 LAND USE IMPACTS for discussions regarding construction staging and maintenance of access.

561. Construction period impacts will be felt at the Museum; the extent of these impacts are documented generally in the FEIS/FEIR. Mitigating measures for the Museum and other South Boston destinations will include a signing and information program. Additional construction-period impact analysis will be performed during the design phases, when further information on construction staging and detours is available. At that time, specific plans to mitigate construction period noise impacts, including requirements for high quality mufflered construction equipment, possible temporary noise barriers, etc., will be addressed and implemented, as appropriate.

562. The design of the Northern Avenue Bridge is beyond the scope of this project. However, the Commonwealth is currently examining design options for that bridge as an independent project as a result of community concern for this project.

It is obvious from your literature that Alternative 5A disrupts all businesses, while Alternative 3 disrupts only 24 businesses, quite aside from the fact that Alternative 3 costs a lot less. A further perusal of the plans and charts accompanying your studies indicate that, for Alternative 5A, a general routing would be feasible which would not disrupt as many businesses and, in fact, go through areas which are now empty parcels.

[illegible]

The City is said to need a larger tax base; such a tax base is presently in the making because of the very decisive upgrading of real estate South of Fort Chancel. Your proposed Alternative 'A' road right through the middle of this district obviously disrupts this additional tax base for the City.

In short, as President of this Company, I am definitely against Alternative 5A of the proposed transportation expansion. In principle, I am also against Alternative 3. In view of our requirements here, and should Alternative 5A become a reality, I want from you a cogent, constructive and feasible plan to satisfy our needs to help us deal with the impending crisis to this business.

Respectfully yours,

PROTECTOR MANUFACTURING COMPANY

P.S. Noyes
President.

2011

RESPONSE TO COMMENTS BY NOYMER MANUFACTURING COMPANY (AUGUST 18, 1983)

563. The FEIS/FEIR addresses the question of business relocation in Section 4.3.3 RELOCATION IMPACTS; a description of relocation benefits is contained in that section (4.3.5). The Massachusetts Department of Public Works will provide assistance in relocation and in finding replacement sites for displaced businesses. The maintenance of the Noymer Manufacturing Company Co. is a serious concern. The Commonwealth will consider the provision of special incentives to businesses to help them and to ensure that they relocate in the immediate area. These options will be explored fully in the design stage (Section 4.3.2). The primary reason Alternative 3 displaced so few businesses was because it did not provide the necessary improvements to the Central Artery. Comments regarding the adequacy of public transit to serve the needs of the CBD are discussed in Section 1.3 MAJOR POLICY ISSUES and Section 2.3 ALTERNATIVES CONSIDERED IN THE EIS PROCESS.

564. Please see Sections 1.3 and 4.2 of the FEIS/FEIR for discussions of the relationship of this project to public transportation strategies.

NOYMER MANUFACTURING COMPANY
430 Summer Street Boston, Massachusetts 02210 U.S.A.
Telex: NOYMERCO Toll Free 800-343-2792 MA 617-426-6383

August 18, 1983

Mr. Robert McDonagh, Chief Engineer
Massachusetts Department of Public Works
100 Nathan Street
Boston, Massachusetts 02114

Dear Mr. McDor:

RE: TIBORO HARBOR TUNNEL

Although in planning stages apparently for years, we first learned through the press that the proposed Alternative 5A for Third Harbor Tunnel poses a very grave threat to this Company. Subsequently, we were contacted also by the engineering firm responsible for the project who acquainted us with the same facts.

This was the second time in a decade during which this Company is being sold to the public. We were part of the relocation plans for the present Federal Reserve area. Because of our concern for our work force and our history with the City, we elected to move as close as possible. At the same time, I do remember that actually most of the companies located in the old complex of Atlantic Avenue, Congress Street, North Street Avenue, and Sumner Street, did not survive the relocation. Indeed, very few businesses located on the North side of the river survived. The closing of a number of years of losses in order to recover our plant capacity.

We are a basic manufacturing concern. We are told that the country needs again basic manufacturing. We manufacture leather goods and are the only Company left in Boston manufacturing that particular trade. We are a seasonal business employing from between 75-170 people. Our work force comes from South Boston and Boston.

We chose our present 2-acre site in order to be able to expand our factory and warehouse. We also need ample dock and loading space, as well as parking. We have just purchased \$40,000.00 on engineering plans to double our facilities. We have a 5-year plan in the works in order to accomplish this. We need proximity to the Port of Boston and to public transportation.

The displacement of well over 100 establishments obviously expresses the willow dis-
tress on part of the city - or possibly the State - for the smaller businessman. It
does not go unnoticed that the special interests of Gillette and Miller remain safe-
guarded. It is obvious that they have access to information pipelines and decision
makers so that one cannot help but suspect that the public forums are merely an exer-
cise in futility because the decision has already been made.

While our present site was chosen because of proximity to the last site, as well as other factors mentioned, this property now provides the financial facility for expansion - by way of collateral to our bank - Bank of Boston. I would like to know this City, or this State, notwithstanding the upheaval and disruption to our business, can duplicate this particular site for us, giving us the same financial resources.

STANLEY OF ENGLAND

SHOWROOMS Atlanta • Bedford, MA • Boston
Columbus • Dallas • Detroit • Indianapolis
Kansas City • Los Angeles • Minneapolis
New York • Reston, VA • San Francisco • Seattle

August 22, 1983

Mr. James A. Walsh

Division Administrator
Federal Highway Administration
Transportation Systems Center
1 Broadway, 10th Floor
Cambridge, Massachusetts 02142

Mr. Robert J. McDonagh, P.E.
Chief Engineer
Massachusetts Department of Public Works
100 Mashua Street

Boston, Massachusetts 02114

FILE: FHWA-MA-92-01-D3
Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 91,
Boston, Massachusetts

Dear Messrs. Walsh and McDonagh:

The following is the initial response of the Downtown North Association to the Supplement to the Draft Environmental Impact Statement/Report of the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93, Boston, Massachusetts.

The Downtown North Association represents the landlords and tenants in the North Station area. For all intents and purposes this area includes the Bullfinch Triangle, Longfellow Place, the North Station Urban Renewal area north of Causeway Street.

In terms of the overall benefit to the City of Boston and the metropolitan region, the Association supports the concept of the depressed Central Artery and Third Harbor Tunnel.

The Association has, however, great concerns about the impacts of the conflict as it affects the North Station area.

The proposed alignment necessitates the acquisition and demolition of some very substantial buildings which house a number of area businesses. If a new alignment cannot be found which would save these buildings, then it is absolutely critical that the building owner be made financially whole and that the businesses situated in these buildings be relocated to suitable buildings with a minimum of disruption in such a way that the businesses suffer no financial loss and that no jobs are lost in the process. Preferably, these businesses should be relocated in the area so that existing relationships and consumer area benefits are not lost.

[illegible]

Meunier, Walsh and McDonagh

✦

August 22, 1983

The proposed alignment also threatens the existence of the continued operation of the Boston Garden unless provisions are made to replace the Garden's service and storage facilities and provide it with suitable accessibility. If these provisions are not made, the North Station Area as a whole will greatly suffer since the Garden provides a very substantial spin-off to many of the local businesses.

Although the Association is worried about the many negative impacts described in the EIS/EIR, it has particular concern with the area's accessibility. The current plans are not satisfactory as the patrons to many of our businesses will find it easier to go elsewhere.

In addition the Association fears that the area will suffer great damage and inconvenience during the course of construction. The area is currently experiencing many problems caused by the construction of the GSA building when officialdom promised no disruption of traffic. The relocation of roads and utilities have taken double and triple the time originally projected. The amounts of dust, odors, noise and vibration have also been more severe than originally projected. We also think that adequate measures can be taken to mitigate all of these short-term impacts.

As we are interested in the heritage of the North Station Area, we regret the decision to take buildings which are either on the National Register or qualify for the Register.

We are also concerned with the issue of safety during and after the construction of the project.

We ponder the impact of unknowns such as the location and appearance of the ventilation towers and the ultimate aesthetics of the area when the project is complete.

Should this project go ahead, we would like the continued opportunity to make input and to review the progress.

Sincerely yours,

DOWNTOWN NORTH ASSOCIATION

Paul A. Mooney

PAMET

565

RESPONSE TO COMMENTS BY DOWNTOWN NORTH ASSOCIATION (August 22, 1983)

565. Compensation for buildings and businesses taken by the project will be in accordance with Federal Highway Administration relocation benefits. The Massachusetts Department of Public Works will provide assistance to businesses to find relocation space; see Section 4.3.5 Massachusetts Department of Public Works Relocation Procedures.

566. Taking of the Analex Building requires relocation space and comparable delivery access to be provided for the Boston Garden (if the Garden is not replaced by a new Arena) to ensure that none of its operations are disrupted. See Section 4.3.2 Displaced Businesses and the Availability of Comparable Relocation Space.

567. Access to the North Station area, for motorists as well as for pedestrians, will be maintained throughout the construction period. During the design phase, extensive inputs from the public and affected businesses will be sought to develop an acceptable staging plan for the highway project in this area.

568. Mitigating measures during construction will address access, dust, noise and vibration, etc. and will be developed in conjunction with affected parties.

569. Aesthetic impacts on the North Station area are addressed in Section 4.16 AESTHETIC IMPACTS and in Sections 5.1.3, 5.1.4, and 5.2.2 of SECTION 4(f) EVALUATION; mitigating measures to ameliorate impacts are also discussed in that section. A Section 106 Memorandum of Agreement has been executed with the Advisory Council on Historic Preservation, the Massachusetts Historic Commission, the Boston Landmarks Commission, the MDPW, and the FHWA, which documents the planning process and measures to mitigate unavoidable adverse impacts to historic properties. The Association will be invited to be directly involved in further design efforts, including those to deal directly with the issues raised in this letter.

Charlestown North Area Task Force

49 Park Street • Charlestown, Massachusetts 02129

Co-Chairmen: Richard A. Johnston, Donald R. Jackson

CHIEF ENGINEER
RECEIVED

Robert J. McDonough, Chief Engineer
Massachusetts Department of Public Works
100 Nashua Street
Boston, MA 02114
22 August 1983

Re: St. James to the Draft EIS/EIR for the Third Harbor Tunnel/
Central Artery.

Dear Sir:

The Charlestown North Area Task Force, the community group which has provided continuing review of the North Area Project, is pleased to submit the following comments concerning the Central Artery Project.

As you know, the North Area Project has been approved by the Federal Highway Administration and is about to start its final design stage. This project will depress beneath City Square, Charlestown the existing overhead connections between the Mystic River Bridge and the Central Artery/I-93 viaduct. The close relationship between the North Area and the proposed Central Artery projects requires that the North Area be designed in a manner which is in harmony with the North Area Project and the interests of Charlestown.

First among the impacts of the proposed Central Artery on the North Area Project is the northbound roadway from the Charles River to I-93. The proposal calls for a long upgrade which is certainly a generator of significantly more noise and air pollutants than the existing roadway. Furthermore, this roadway is moved approximately 150 feet closer to the historic town of Charlestown than the present location. The historic town of Charlestown is being relocated to the west of the existing viaduct and request that this solution be given thorough study.

Second among the impacts are the two low-level Charles River bridges. Again, the northbound lanes generate the greatest impact since they are lower than either of the present bridges. They are located closer to the heart of Charlestown than the existing bridges and are directly in the path of the proposed pedestrian/bikeway over the Gridley locks. Again, we request a location to the west of the present bridge.

In the course of the North Area meetings, state officials and consultants discussed probable pedestrian/bikeway continuations of the

existing Cambridge and Boston esplanades. The design of the new bridges must reflect the importance of these future links in the local transportation and recreation systems. The design of the bridges, pedestrian bridges, and pedestrian/bikeway continuations must also reflect their prominence as viewed from City Square in Charlestown and their position at the entrance to an historic waterway.

The Charlestown North Area Task Force has been most actively involved during the past few years working with the Commonwealth, its design consultants, and numerous other groups to ensure that the North Area Project benefits the community as well as regional interests. This participation has been vital to the project. It has provided major benefits for us while for the Commonwealth our involvement secured lost Federal Highway Administration funding for the major portion of the project. We request similar involvement with the Central Artery Project and fully support community groups in the North End, South End, East Boston, South Boston, and East Boston in their demands for the same.

For the North Area Task Force, yours truly.

Donald R. Jackson, Co-Chairman
Richard A. Johnston, Co-Chairman
William P. Linn

cc Secretary James S. Hoyt
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

RESPONSE TO COMMENTS BY CHARLESTOWN NORTH AREA TASK FORCE (undated)

570. There has been and will continue to be extensive coordination between the North Area Project and the Central Artery Project. The Commonwealth is aware of the close relationship between these two projects and the interests of the Charlestown community.

571. Noise impacts of the long upgrade are discussed in Section 4.8.1 Noise, which also includes a discussion of mitigating measures. Relocation of the proposed northbound Central Artery lanes (and hence the southbound lanes as well) to the west of the existing viaduct would result in unacceptable geometrics and would have significant implications on the North Area Project which is expected to be completed before construction begins on the Central Artery Project. Decisions regarding the proposed Central Artery alignment were based on the existence of the North Area Project; it is unlikely that once constructed, the North Area Project would be dismantled because of a westerly Central Artery alignment.

572. As a measure to mitigate Section 4(f) impacts on Paul Revere Landing Park, EOTC and MDPW will continue to work closely with MDC to facilitate land acquisition on the Charlestown side of the River; preservation of access to recreational values of the Charles River Basin will be a major objective in development of a single plan for the area, and suitable remnants of parcels acquired for right-of-way for the Central Artery Depression Project and the related North Area Project will be made available for park use.

Impacts to Charles River Basin open space include the use of Section 4(f) property at Paul Revere Landing Park and Charles River Reservation, construction period disruption of these Section 4(f) properties, and other potential long-term impacts to Paul Revere Landing Park. There are also potential impacts on open space development plans for land between these properties but not subject to Section 4(f). The mitigating measures in the FEIS/FEIR include actions to facilitate open space development plans for adjoining portions of the Charles River Basin as offsetting benefits to mitigate impacts on the Section 4(f) properties. See Section 5.1.4 Paul Revere Landing Park.

573. Public participation has been an important factor in the design of the Preferred Alternative and will continue to be solicited throughout the subsequent design phases of this project.



Charles Byrne, Jr.
224 Concord Avenue
Cambridge, Massachusetts 02138
18 August 1983

Robert J. McDonagh
Chief Engineer, Department of Public Works
100 South Street
Boston, Massachusetts 02114

Re: Supplemental Part Environmental
Impact Statement (SEIS), Third Harbor
Tunnel/Central Artery Project

Dear Mr. McDonagh:

Having read the Summary of the SEIS for the above project, I have the following comments to make re (1) the pushcart produce vendors at Haymarket and (2) the Port Point Channel.

(1) Construction on depressing the Central Artery will cause major disruptions to downtown Boston, including the block of Blackstone street between North street and Manover street. This block of Blackstone street, which abuts the project area, is presently used as an outdoor produce market on Fridays and Saturdays. The interests of the vendors (and their customers) need to be adequately represented in the final EIS.

The produce vendors, being mobile, are easy to overlook. For example, they do not qualify for relocation aid. Yet, although

they are not major contributors to the city's economy, the pushcart vendors are certainly an important part of the city in many ways.

As far as this project is concerned, the vendors' needs are simpler. A suitably large, open area should be set up for them to set up their stands two days a week without major disruptions. I am sure that it will be easy enough to address this issue properly in the final document.

(2) The second issue, the Port Point Channel, is far more important and far more complex. It demands intelligent and historically sensitive planning and potential relocation and all of the proposals for either a tunnel or a depressed artery (or both) will have an enormous impact on the Channel. The questions raised are (a) Is this impact necessary? and (b) Will it be beneficial or adverse?

(a) First, I question whether in fact it is necessary to depress the Central Artery through the Port Point Channel. This issue is not even addressed in the summary of the SEIS or in the other documents I have seen. For example, why can't the existing South Station tunnels be improved instead of building a new road? And, if a new route is necessary, must it go through the Channel? Are there alternative routings, such as via Atlantic Avenue? These questions should be addressed more fully.

(b) If the project must be built through the Channel, the question of effect remains. Alternatives 3, 4A, and 5 will all have a profoundly severe impact, primarily because

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of entrance and exit ramps in the Channel area. These ramps would effectively destroy this valuable resource for all future generations. Alternative 3A, with neither ramps in the Channel nor a new Dorchester avenue, is the best option offered so far. Alternative 3A modified with the addition of a new Dorchester avenue, will also have a great adverse effect.

Yet I question why the Dorchester avenue part of the project should be necessary at all. Dorchester avenue is in no way connected to the rest of the project, and it could easily be deleted without any effect at all on the remaining project sections. In Alternatives 3 (before modifications), it has already been deleted!

Without the new Dorchester avenue, the possibility exists for significantly improving the Port Point Channel as a recreation area. After the tunnel through the Channel is completed, the top of the tunnel could be landscaped into a waterfront park. In time this park could rival the Charles River Esplanade as a site for water-side activity and enjoyment. At the same time, it would increase property values along the Channel and encourage other, private development in the area.

With Dorchester avenue, however, these possibilities are stifled. The Channel would become a concrete desert; property values would drop; and no new development would occur.

I question why this environmentally negative part of the project, one which

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had already been deleted, was allowed to rise from its grave at the latest round of modifications. And I urge you to reconsider and to remove the new Dorchester avenue from further consideration in the Tunnel/Artery project.

Whatever the other merits of the Tunnel/Artery project, the inclusion of Dorchester avenue is certain to generate opposition from abutters, from the preservation community, from harbor advocacy groups, and from others. This opposition, and the resulting delays, would certainly result in gains from this part of the project being few.

(3) I can only add that the overall project -- and especially the depression of the Central Artery -- seems in the long run to be both necessary and desirable. Of the proposals advanced so far, Alternative 3A is the best. I am sure that you will take all respects except for the impact of the Dorchester avenue discussed above.

Yours sincerely,

Charles Byrne, Jr.

RESPONSE TO COMMENTS BY CHARLES BARNE, JR. (August 18, 1983)

574. Measures included in this project to ensure continued operation at Bymarket are detailed in Section 4.4.3 Preferred Alternative (re land use impacts). These include the provision of space in the immediate area, both during and after construction, for pushcart storage and truck space, and provisions to protect the area from dust and noise. Access to the area will also be maintained.

575. The Preferred Alternative represents the least disruptive alignment in the Port Point Channel area. Section 4.16 AESTHETIC IMPACTS outlines mitigating measures, consistent with the Section 106 Memorandum of Agreement, including pedestrian areas which would help to accommodate recreational uses in this area. Relocated Dorchester Avenue has been reduced in scale to a two-lane northbound roadway along the Channel, and realigned near Summer Street to further minimize impacts. Its function is to provide access to the CBD and Financial District from the south necessary due to removal of the many exits from the Artery now serving the area. Its need was demonstrated with Alternative 5A, which provided poor traffic service to the CBD area from the south. Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE and Section 3.2.3 Fort Point Channel District explains the need for a relocated Dorchester Avenue and the alternatives which were examined to avoid construction in the Channel. Specifically addressed were improvements in capacity through the Dewey Square tunnels; not increasing capacity in the Dewey Square tunnels; an Atlantic Avenue Tunnel Concept; and a Dorchester Avenue Tunnel Concept. Reasons for rejection of these alternatives is presented in Section 2.4 REASONS FOR NOT SELECTING OTHER DIS ALTERNATIVES.

576. See Section 4.2 for a discussion of the transportation requirements which resulted in the inclusion of a new two-lane northbound Dorchester Avenue in the Preferred Alternative.

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84876
CHIEF ENGINEER
RECEIVED
AUG 19 1983

August 18, 1983

Mr. Robert McDonough
Chief Engineer
Massachusetts Department of Public Works
100 Ashua Street
Boston, MA 02114

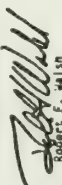
Dear Mr. McDonough:

As Executive Director of South End Technology Square Associates, I hereby submit for inclusion in the public hearing record the statement submitted in the Draft Environmental Impact Statement/Report for a Depressed and Aligned Central Artery/Third Harbor Tunnel Project, Interstate 90.

In addition, I would like to be placed on the community participation mailing list maintained as SETSA's representative in any meetings or discussions regarding South End Technology Square Associates' project alternatives and ongoing design modifications.

Thank you for this opportunity to make our position known, and best of luck in your ongoing planning and design efforts.

Very truly yours,


Robert F. Walsh

Robert F. Walsh Associates
100 East Concord Street
Boston, MA 02118
017-302-9222

STATEMENT OF ROBERT F. WALSH, EXECUTIVE DIRECTOR
SOUTH END TECHNOLOGY SQUARE ASSOCIATES
REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT FOR A
DEPRESSED AND WIDENED CENTRAL ARTERY/
THIRD HARBOR TUNNEL PROJECT, INTERSTATE 90
AUGUST 18, 1983

South End Technology Square Associates (SETSA) is a consortium of individuals, and major employers in the Albany Street area of Boston's South End, including the Boston University Medical Center, University Hospital, Boston City Hospital, New England Nuclear, and the Boston Flower Exchange. Together, the SETSA members represent an employment base of 5500, and a daily population of approximately 10,000 employees, students, patients, and visitors from all parts of the Boston metropolitan area. At the present time, SETSA is awaiting Boston Redevelopment Authority designation as developers of a parcel located between Albany Street and the southbound Massachusetts Avenue Southeast Expressway off-ramp. The development plan, which calls for construction of 544,000 gross square feet of office space, a 250-room hotel, and 1600 structured and surface parking spaces, will increase employment in the area by 1700, and daily visitors by 1250 at project completion in 1989. Although the location of SETSA's members and of the development site is at the fringes of the Artery/Tunnel project area, SETSA is concerned both with long-term issues of access to the area and short-term construction impacts.

Long-Term SETSA Access Considerations

The present supplement to the Draft Environmental Impact Statement has comprehensively recognized Boston's core area transportation problems and has creatively reformulated the Third Harbor Crossing options to address the problems of insufficient Central Artery capacity as it crosses the Charles

River, and the need for a definitive Seaport Access Road to serve the developing commercial and industrial areas of South Boston. While we support the overall concept of combining the two projects, the tunnel/artery alternative with the most benefits for the SETSA area in terms of improving regional access is the Alternative SA design modification, still under development. SETSA therefore supports this design option, which routes the tunnel on the seaport access road alignment through South Boston.

For SETSA, this option has many advantages. Not only is access to Logan Airport and the north shore improved by eliminating the need to use the Central Artery to reach the tunnel (as it would be in any of the Harbor Crossing options), but access is also improved from the SETSA area to the South Boston industrial area, with an interchange provided with the Congress Street/Northern Avenue connector short of the tunnel entrance. Direct access to and from the Boston Marine Industrial Park via Northern Avenue and to Castle Island/Boston Edison via Summer Street/First Street are also provided. In addition, the relocated Dorchester Avenue on top of the tunnel in the Fort Point Channel provides direct one-way northbound access from the frontage road at Berkeley Street to Summer and Congress Streets, bypassing the Turnpike interchange and the Dewey Square Tunnel. The new Dorchester Avenue will connect directly with Herald Street, which is being widened by the City of Boston to serve as a South End peripheral road, reducing traffic impacts on local South End streets.

As designs for the ramp connections at Herald and Albany Streets and the Frontage Road are refined and changed, SETSA wishes to be represented in meetings and discussions held between the study team and the South End community regarding the plans. In particular, we suggest that the study team

review the SETSA proposal for a relocation of Albany Street to the southeast of the SETSA development parcel, a plan which would effectively extend the peripheral road to Melnea Cass Boulevard.

Construction Impacts

While we understand that construction impacts are temporary in nature, the construction period impacts for a project of this size are both complex and relatively long-term in duration. SETSA would like to make certain that the following issues are addressed.

Albany Street and the Frontage Road will be used for construction-related truck access to the Turnpike and Central Artery. The hospitals have concerns regarding noise, vibration, and dust, and must be involved in the truck routing plans as they are developed.

Both the West Fourth Street and the Broadway Bridges will have to be alternately closed for approximately one-year periods while they are reconstructed and tunnel excavation proceeds beneath them. The Broadway Bridge closing will affect MBTA fixed-route bus service and SETSA employees shuttle service from Broadway Station to the SETSA area. SETSA should be notified of these closings in sufficient time to plan temporary shuttle bus reroutings and to notify employees of the changes which will occur when the bridge is closed.

Conclusion

In conclusion, I would like to reiterate SETSA's overall support for the Artery/Tunnel project, and for a planning process which has shown both creativity in meeting long-term regional transportation needs and sensitivity to the localized concerns of affected residents and businesses. In

particular, we endorse the Alternative 3A design modifications, and look forward to working closely with the study team as the South End area design is further developed.

RESPONSE TO COMMENTS BY ROBERT F. WALSH ASSOCIATES (SOUTH END TECHNOLOGY SQUARE ASSOCIATION) August 18, 1983

577. The relocation of Albany Street is beyond the scope of the Third Harbor Tunnel/Central Artery project, but it will be considered by the Commonwealth separate from this project.

578. Construction period measures to mitigate noise, vibration and dust will be followed. Neighborhood residents and businesses will be consulted regarding traffic management via the public participatory process. The detour routes and construction routes cannot be more accurately defined until the design phase of the project. At that time, public input will be sought to assure the routings involve the least impacts to adjacent properties.

579. The West Fourth Street Bridge will be rebuilt (as a separate project by the City and State) prior to the commencement of the Third Harbor Tunnel/Central Artery project. The Preferred Alternative replaces the existing Broadway Bridge with the Herald Street Extension which can be completed prior to closing the Broadway Bridge. These conditions will reduce access impacts on the South End. As mentioned above, public input will continue to be sought regarding construction period detours, access routes, and impacts.



228 Congress Street
Boston, Massachusetts 02114

August 22, 1983

(617) 452-7000

Mr. James A. Walsh
Division Administrator
Federal Highway Administration
Federal Highway Administration
55 Broadway, 10th Floor
Cambridge, Ma. 02142

Mr. Robert J. McDonagh, P. E.
Chief Engineer
Massachusetts Department of Public Works
100 Mishaw Street
Boston, Ma. 02114

RE: FHWA - MA - EIS - 82-02-05

Sentimental

This letter is to express my support for Alternative 5-A Modified as described in the above referenced document.

I wish to express my strenuous objection to all other alternatives for my proposal which would construct a third harbor tunnel other than on the proposed Sea Port Access alignment or without depressing and widening the Central Artery.

To the best of my knowledge, Russia Wharf is the only privately owned property having direct access to the Fort Point Channel's West Bank which will have the proposed Northbound Depressed Central Artery aligned between its' buildings and the water.

The potential exists for serious diminution of the value of our property if the proposed construction is at all intrusive on our views, marina, parking facilities or water edge access.

Accordingly, my support of 5-A Modified is based on the final design of the Northbound Central Artery tunnel located in the Ft. Point Channel achieving the minimal impacts on the Channel and Russia Wharf implied in the "Channel Preservation Design Refinement" plan which was exhibited to me on August 15, 1983.

-continued-

- Page Two -

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Additionally, the inclusion of the proposed New Northern Avenue bridge "by others" in the E.I.S. and the dependence on it as a necessary link in the system implied by so including it requires that I take strong objection to the construction of this proposed bridge in the area. It is my belief that at any time this infamous proposal appears in any form might lead to the misinterpretation that it is in any way acceptable.

This proposed new bridge is an unnecessary, bondoggle proposed to be constructed at great public expense to serve a narrow private interest.

It is an anathema to the Fort Point Channel community and to all informed parties who have the welfare of Boston Harbor and the city itself as their goal.

The street patterns in South Boston and across and around the Fort Point Channel required in connection with Alternative 5A Modified should be created to eliminate any dependence on such a proposed bridge.

In general, otherwise I feel Secretary Salvucci and his staff are to be commended for the vision and effort they have brought to this project. I am confident that all our concerns for the Fort Point Channel will be dealt with sympathetically in the future by his office in their final solutions to this regions' transportation problems.

Very truly yours,

John W. Priestley, Jr.
General Partner
Russia Wharf Company

JWP:gg

RESPONSE TO COMMENTS BY RUSSIA WHARF COMPANY (August 22, 1983)

580. The Preferred Alternative has been designed to minimize impacts to Fort Point Channel while providing necessary transportation improvements: see Section 4.4.3 Preferred Alternative (re land use impacts), and Section 4.16 AESTHETIC IMPACTS. The design modifications are described in Chapter 2.0, and the Section 106 Memorandum of Agreement describing the design refinement process and the measures taken to mitigate historic impacts is contained in COMMENTS AND COORDINATION.

581. The contents of that plan have been incorporated into the Preferred Alternative.

582. The location and design of the new Northern Avenue Bridge are beyond the scope of the Third Harbor Tunnel/Central Artery project. However, the proposed Northern Avenue Bridge is presently being reviewed by the MDPW in another on-going, but separate, study and design process.

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August 22, 1983

Mr. Robert J. McDonagh
Chief Engineer
Massachusetts Department
1100 Natchua Street
Boston, MA 02114

Re: Central Artery/Harbor Tunnel Project
Supplemental Draft Environmental Impact Statement

Case 1:09-cv-00001

The following comments on the General Attery/Harbor Tunnel Project Supplemental Draft Environmental Impact Statement concern impacts on the waterfront neighborhood and particularly, the lower waterfront. The waterfront neighborhood is a historic area of the city of San Francisco. The Bay Area Regional Development Commission was designated by the State of California to develop and authorize a redevelopment for the Lower/Port area, which has been identified in the SIFIS as a potentially damaged neighborhood to the General Attery construction.

In reviewing the alternative plans presented in the SDMS, Alternate 3A modified seems the most beneficial scheme overall. Alternate 3A provides clear long-term economic and transportation benefits. It is an integrated approach towards solving the regional and metropolitan traffic problems, which, if not addressed now, will result in severe negative impacts in the future.

The MA modified plan also allows for long-term benefits through the removal of an unsightly obstruction between Boston's Downtown and waterfront. It supports the future development of the depressed Central Artery Viaduct, which will provide the fullest advantage of the opportunity to retain these areas. Fully realizing the potential of Boston's waterfront will require a more aggressive approach. MA strongly supports investigation now being conducted by the Federal Highway Administration, the Port of Boston, and the City of Boston to determine the feasibility of a deepened harbor and the planned extension of a landscaped pedestrian promenade along the waterfront.

While the SP2S explores certain impacts on the waterfront neighborhood, we have been able to focus in detail on this area. We accordingly wish to inform you of additional concerns and measures that should be taken to relieve these problems. The steps are required to both ensure that development and use of the waterfront continue during the entire construction period, and permit the successful redevelopment of Roves/Fosters Wharf.

The Rowses/Foscers Wharf development is now underway. Accordingly, a program of development and financing agreements has been initiated, and major

Mr. Robert J. McDonagh
August 22, 1983
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Expenditures have been made and are planned to implement the project in accordance with the RIA designation. Consistent with these agreements, the project should be under construction in early 1985, and be completed between 1987 and 1988. It is therefore critical to begin immediately to plan for final Artery design configurations, and anticipate construction processes, scheduling, and phasing, so that the Kowar/Gotters project can proceed on schedule.

The Rome/Torres development proposal submitted by The Bescora Companies was submitted to the City for review and design and development reviews throughout a year-long construction process. Our proposal was selected for providing superior benefits to the City, particularly in regard to public access to the sea. The project is consistent with the 1979 Boston Harbor Masterplan (Sasaki/Dawson plan), conceived as a mixed-use development of office and retail space and residential condominiums, with below grade parking to serve the project users. A modern ferry terminal facility including 18,000 square feet of indoor and outdoor waiting space is integrated within a network of public open space. The project design derives from the Boston Society of Architects' guidelines, which include three major public access goals: "to provide access to our design, these elements have been integrated into an extensive system of public open space and public spaces to connect the City to the sea. It is of paramount concern that the final design of the depressed artery support the strategic objectives of the BIA designation."

As stated in the SDIFs, there could be considerable adverse effects on Rovers/Voters thru redevelopment from Central Artery construction. In reviewing the plans and documents, we have confined our consideration to Alternance 5A modified, and have identified potential negative impacts as follows:

- o **Economics:** Adverse effect on sales and revenues during the critical marketing and initial occupancy phases, from 1986 through 1989;
- o **Environmental:** Adverse impacts on residents, tenants and visitors during the construction period;
- o **Access and traffic:** Short- and long-term limitation and/or restriction of pedestrian and vehicular access to this area of the waterfront; and
- o **Design:** Long-term aesthetic impact if designs for final roadway and new waterfront promenade are not properly integrated with the Rosen/Forster Urban design.

In order to alleviate these impacts, mitigating measures have been identified as important steps for improvements in the Waterfront area, which are as important to the feasibility of Houses/Stores than the measures all derive from one goal, which may be adopted as a fundamental planning principle for the Artery/Tunnel project: that active development, construction and use of the Waterfront must continue space throughout the entire construction period.

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Mr. Robert J. McDonagh
August 22, 1983
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The required mitigations have been developed by Skidmore, Owings & Merrill, project planners and architects for Rouse/Fosters Wharf. They are described in detail in the attached plan and narrative outline, and encompass the following major points:

1. Long-term impacts:
 - o Improve street level plan to enhance pedestrian and vehicular connection between the Downtown and Waterfront Districts;
 - o Institute management processes which include substantive roles for adjacent property owners;
2. Construction Period Impacts
 - o Coordinate construction schedules and processes to minimize adverse economic impacts;
 - o Provide pedestrian and vehicular access to and from site; and
 - o Establish construction standards and measures to limit environmental hazards.

The scope and nature of these steps reflect our belief that the Rouse/Fosters Wharf project can co-exist with the Central Artery reconstruction, but only if there is careful and thoughtful planning, coordination of schedules, and a real commitment to implementing the relief we require. The complexity of the Central Artery project necessitates that an independent professional planning, design, and construction group be retained to coordinate the project in this fashion. This will ensure that mitigating measures are properly implemented and maintained throughout the duration of the project. In specific regard to Rouse/Fosters Wharf, we seek a commitment to carry forward project planning and design by including our professional representatives directly in that process, giving them standing to coordinate with the Commonwealth's representatives on a regular basis.

In line with this coordination, we would be pleased to explore any possible means by which development at Rouse/Fosters Wharf could support or provide other comprehensive public benefits to alleviate Artery impacts. For example, we have been considering possible coordination of the Artery slurry wall construction and Rouse/Fosters substructure work to provide below grade public parking under the rebuilt Atlantic Avenue. The potential for expanded water transit services, as an alternate mode during the construction period, could also be explored in conjunction with the Rouse/Fosters Wharf redevelopment.

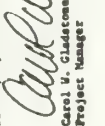
We have reviewed the mitigating measures required for the Rouse/Fosters Wharf project with the staff at the Boston Redevelopment Authority, and they have

Mr. Robert J. McDonagh
August 22, 1983
Page 4

found our requirements consistent with the Authority's long-term objectives for development of the site, and with their comments on the SDEIS. We look forward to detailed reviews of these measures, and early agreements as to schedule and implementation.

Sincerely,

The Boston Commons
Developer, Rouse/Fosters Wharf


Carol W. Gladstone
Project Manager

CWG/ew

Attachment

cc: Robert J. Ryan
Director, Boston Redevelopment Authority

August 22, 1983

The Howes/Footers Wharf development adheres to the objectives of the BSA competition guidelines, including the design of the waterfront area. The design provides a high quality, mixed-use development, residential, commercial, office and retail space, and a modern ferry terminal facility including 18,000 square feet of indoor and outdoor waiting space are completely integrated through an elaborate system of public walkways and open space.

The Howes/Footers Wharf development is now underway, sound planning principles should encourage continuing development and use of the waterfront throughout any long-term artery construction period. Accordingly, measures have been laid out which allow the Howes/Footers Wharf site to be redeveloped and occupied during this construction process.

The measures discussed under section I.A. below, relating to the pedestrian and vehicular connection between downtown and the waterfront, are illustrated in a sketch which accompanies this discussion.

I. A DEPRESSSED CENTRAL ARTERY AT COMPLETION - LONG-TERM EFFECTS

A. IMPROVE STREET LEVEL PLAN TO ENHANCE PEDESTRIAN AND VEHICULAR CONNECTION BETWEEN DOWNTOWN AND WATERFRONT

1. Relocate Vent Stack Away From In Front of Howes/Footers Wharf

Consistent with design requirements of the Boston Redevelopment Authority (BRA), the Howes/Footers Wharf development does not turn its back on the city but rather opens a grand public entrance to the sea. This should not be blocked by a vent stack. Howes/Footers Wharf will bring people to the waterfront to visit, use water transportation, work and live. This active residential and public recreation area should not be subject to visual obstruction or to the hazards of high custom automobile concentrations once the Artery is depressed.

The vent stack should be moved and potentially be consolidated with the vent stack directly to the south. This one vent would serve both a northbound tunnel and the central section of the Artery. A temporary vent location to the side of the existing Artery which would be moved later to a location over the depressed Artery should be provided, if needed. This would allow for incorporation of the vent in an appropriate new development parcel and minimize effects on the residential waterfront.

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2. Relign the New Surface Artery Northbound (Atlantic Avenue)

Once plans are revised to locate the vent stack away from residential waterfront use, Atlantic Avenue can be constructed to follow a straighter alignment in the area of Howes/Footers Wharf. This allows for a small buffer area to protect this new residential site from the addition of vehicle traffic, including hazardous cargo trucks, which will pass by the front door of the development. The alignment of land which would remain to be used for residential development would be available to the waterfront. Atlantic Avenue should be made continuous with an allowance for three curb cuts onto the Surface Artery.

This will allow the Beacon Companies to landscape this area as a buffer against interim construction impacts and heavy surface street traffic after completion of the Artery. In addition, Beacon will provide a small protected drop off area for residents, and a ferry terminal parking area. The alignment of the realigned Atlantic Avenue will maintain access to the project from High Street.

3. Realign High Street as it Crosses the Depressed Central Artery

A realignment of High Street to the south as it crosses from the Financial District to the waterfront will allow for a spectacular waterfront approach to the waterfront and Howes/Footers Wharf from the north to avoid use of the Surface Artery to the south as a turnaround for access to the project.

4. Designate Parcels Above the Artery to the North and South of High Street as Public Park and Open Space

Figure six rights parcels over the depressed Central Artery should be placed with the fabric of the city, opportunities for spectacular views, and a balance of public and private uses in mind. Accordingly, to be consistent with the BRA's urban design goals for the Broad Street and High Street approaches to the public waterfront, no commercial building development should be allowed for approximately 450 linear feet across from the Howes/Footers site.

The southern boundary of this open space area aligns with a major public thoroughfare, the waterfront, boat and ferry terminal on the Howes/Footers site. The northern boundary respects the Broad Street vista to the water. High density residential uses to the north of Howes/Footers Wharf and proposed new high density development areas at Port Hill would also be well served by this public open space concept. Property owners in the area would play an active role in assuring high quality design and maintenance of this open space area.

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5. Move Ramp Portals to the South to Allow Pedestrian Access

Ramp portals, both northbound and southbound, in the vicinity of the Rows/Fosters Wharf should be moved to the south and covered so that public use can be made of open space areas and pedestrian access to the waterfront. The new portals should be located south of the Rows/Fosters site and can be respected. A major pedestrian access to the waterfront and ferry terminal will be via the 10-foot easement between the Atlantic Building and Rows/Fosters Wharf, as determined by the BAA.

6. Construct Pedestrian Access to Commuter/Ferry Terminal over New Surface Artery

A new 18,000 square foot indoor and outdoor commuter boat/ferry terminal will be constructed as part of the Rows/Fosters Wharf development. This terminal is also expected to serve water taxis and is designed for considerable expansion in the future. A pedestrian bridge over the new Surface Artery in alignment with the 10-foot easement between Rows/Fosters and the Atlantic Building would provide a direct route from the Financial District and Downtown to the terminal.

7. Traffic Signals at High Street and the New Surface Artery

It is essential that this intersection be signalized in order to assure safe vehicle and pedestrian access to the waterfront and to allow public use of the waterfront approaches from High and Broad Streets. The Beacon Companies have committed to beautify this crossing but only a well-timed system of traffic signals can provide the necessary control of the high volume of trucks and other vehicles expected along this route.

8. Oliver and Pearl Streets Extended Over the Depressed Artery

The Beacon Companies supports a plan modification which would allow for Oliver Street to continue from the Financial District toward the Northern Avenue Bridge. This would ease circulation and avoid numerous detours and delays. The Beacon Companies also supports the extension of Pearl Street west the Central Artery. This will allow users of the new Surface Artery to change direction and will ease access restrictions to the Rows/Fosters site. In addition this would ease congestion near the Purchase Street on-ramp at Congress and Purchase.

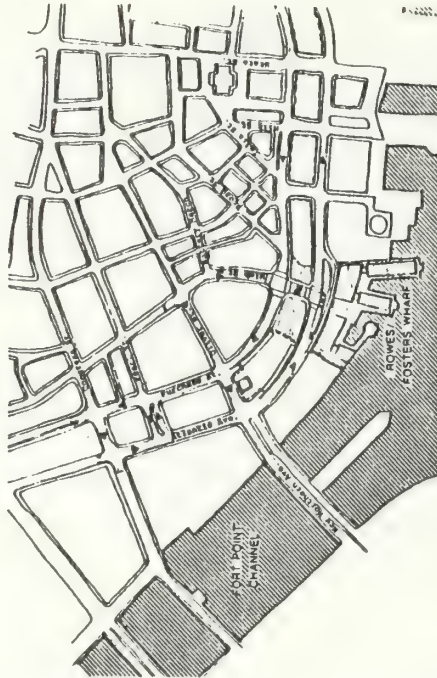
9. High Quality Construction Materials, Procedures and Finishes

Developers of Rows/Fosters Wharf consider it critical that the streets, sidewalks, street furniture and open space above the depressed Central Artery from Long Wharf to the Northern Avenue Bridge set an example in high quality construction and finishes. This is an

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Mitigation Measures Completed Central Artery



- Remove vent from in front of residential area
- Realign Atlantic Avenue
- Provide open space for site buffer and access to waterfront and ferriss
- Realign High Street approach to site
- Move ramp portals south

Please see text for full listing of mitigation measures during construction period and at completion of the depressed central artery.

area used by millions of residents, workers and visitors every year—an historic waterfront of regional and national significance. This area must be carefully managed to insure the construction of a new interstate highway in this alignment.

B. INSTITUTE MANAGEMENT PROCESSES WHICH INCLUDE SUBSTANTIVE ROLES FOR ADJACENT PROPERTY OWNERS

1. Assure Substantive Participation in the Process of Designation AIC Areas Development Process

Actions by the City and state to develop new air rights parcels in this corridor are of great importance to the continuing quality of the Rows/Fosters development. We therefore ask for a clear and substantive role in the planning and urban design process which will lead to development in this area.

2. Continuing Involvement in the Detailed Design of a Depressed Central Artery

Many stages of design and analysis will be required before construction begins and in the years which follow. The Beacon Companies insist on an active role and early notification of design refinements affecting the area from Long Wharf to the new Northern Avenue Bridge.

II. CONSTRUCTION OF THE DEPRESSED ARTERY — TWELVE YEARS OF IMPACTS

A. COORDINATE CONSTRUCTION SCHEDULES AND PROCESSES TO MINIMIZE ADVERSE ECONOMIC IMPACTS

1. Accelerate Construction Program

As much as the specific impacts of construction noise or disruption, it is the extended period of construction which threatens the economic well-being of continuing redevelopment along the downtown waterfront. All efforts must be made to significantly reduce the total construction period from the present program of twelve years.

2. Adjust Construction Schedule to Limit Impact During Marketing and Initial Occupancy of Rows/Fosters Wharf Development

The sequencing of construction phases is of critical importance to the Beacon Companies in minimizing effects on Rows/Fosters Wharf. The Draft EIS Supplement predicts an economic loss which would result from a slower than anticipated rent-up and occupancy period. Adjustments to the construction sequencing to severely limit impacts during the critical marketing period (1988-91) is essential to ensure that the impact. One approach would be to begin construction of the new bridge to occur after the 1988-89 occupancy period.

3. Realize Atlantic Avenue and High Street in the First Sequence of the Construction Process

Adjusting the alignment of Atlantic Avenue to the west in front of Rows/Fosters Wharf will provide the most critical buffer area during the construction period. As well as with the final condition as described above, this will be especially important in bringing prospective tenants to the development, allowing residential users some protection in daily access to their homes, and accommodating increased commuter use of ferry terminal facilities.

The realignment of High Street in an approach toward the center of the Rows/Fosters development would also be useful during the construction period. It would allow direct access to downtown and from the north waterfront to the new development, resulting in turn-around movement at the over-widened Congress and Purchase intersection.

4. Coordinate with Construction Schedule for East Side Interceptor and New Storm Drain

Plans call for installation of two major new utility lines in this area of the waterfront development in the next several years. It is essential that the new construction project in Atlantic Avenue be combined with utility work for the Artery so that disruption to access, dust and noise can be minimized.

5. Minimize Construction Period of Dewey Square Ramp
Construction in the vicinity of the transition between the existing and new tunnels will affect the Howes/Fosters project in later years of construction. All efforts to reduce this construction period should perhaps by avoiding construction of the temporary ramp along Purchase Street—should be taken.
6. Demolish Southern Portion of Elevated Artery Early in Last Sequence
Once the new roadway system is functioning, all efforts to remove the elevated structure is less than the scheduled two years must be taken. Completion of surface roadways, signage and landscaping in a timely manner, using high quality materials and finishes will be critical to public acceptance.
7. Install Permanent Decking Consistent with Landscape Plans During Early Phases of Construction
Installation of permanent decking early in the construction period is supported by The Beacom Companies in the interest of reducing construction time and alleviating additional disruption during the delivery and removal of temporary decking.
8. Accelerate Construction of Tunnel Along Fort Point Channel to Use as Construction Bait Road
Completion of the tunnel for the northbound lanes of the Artery during early sequences of construction could alleviate extensive noise, dust and disruption anticipated during excavation along the southbound front. Used as a bait road under the direction of the arterial construction coordinator, this tunnel could serve a number of contractors and site access purposes.
9. PROVIDE PEDESTRIAN AND VEHICULAR ACCESS TO AND FROM SITE
 1. Realign Atlantic Avenue and High Streets (see above)
These are described and illustrated under long-term effects discussed above.
 2. Maintain Safe and Attractive Pedestrian Access to Key Locations. As Specified
Howes/Fosters Wharf is one part of an extensive pedestrian network which must be maintained during construction. The maintenance of safe and attractive access will require:
 1. Participation in Construction Review
As more detailed plans for construction sequencing are developed and during the projected twelve years of construction, the Beacom Companies agree to attend and participate in the construction review panels and performance in general and specifically as they apply to:
 1. Participation in Construction Review

- o Walkways at least 10 feet in width.
 - o Extensive use of Jersey Barriers and other well proven protective devices.
 - o Covered walkways in areas of high dust or other hazards.
 - o Special pedestrian crossings.
 - o Pedestrian walkways to warn and stop traffic.
 - o Pedestrian walkways to define the pedestrian paths and improve the visual quality of the experience. These plantings of low shrubs and large trees can be placed in movable containers and incorporated into barriers to be moved as accessways adjust.
- Using the above methods, uninterrupted pedestrian access must be provided to:
- o Financial District
 - o Downtown Crossing
 - o Pull downtown waterfront along Atlantic Avenue
 - o South Station
 - o Faneuil Hall
- This pedestrian access will be particularly critical with increased use of commuter boats during the construction period. Prior notice of access route changes is requested.

3. Maintain Vehicle Access to Key Locations

Continued use of the Howes/Fosters site will require uninterrupted vehicular access to the following key locations:

- o I-93
- o I-95
- o I-495
- o Summer/Caliban Tunnel, and later the Third Harbor Tunnel
- o Financial District
- o Downtown Crossing
- o Downtown waterfront
- o Back Bay

C. ESTABLISH CONSTRUCTION STANDARDS AND MEASURES TO LIMIT ENVIRONMENTAL IMPACTS

1. Participation in Construction Review

As more detailed plans for construction sequencing are developed and during the projected twelve years of construction, the Beacom Companies agree to attend and participate in the construction review panels and performance in general and specifically as they apply to:

6. Excavation procedures; shaft locations, methods of excavation and removal, scheduling and so forth.
7. Contractors' sleeping areas, location, use, type of equipment.
8. Street routing of trucks, location, use, type of equipment.
9. Diversion to Atlantic Avenue.
3. Final Noise Protection from Noise, Dust and Other Hazards
- The Beacon Companies has determined the following protective measures must be taken to limit the effects of construction on area buildings and people during the construction period. These include:
- Triple glazing of windows;
 - Additional insulation in walls;
 - Additional HVAC filtering equipment;
 - Structural vibration isolation;
 - Foundation protection;
 - Resident control on-site; and
 - Construction of a separate access roadway for bus and taxi access to the site and commuter bays.
3. Continuous Noise Barrier Along Atlantic Avenue
- A noise barrier should be constructed along Atlantic Avenue of sufficient height and length to protect the at-grade public use areas and first floors of the Homes/Fosters development.
4. Limit Construction Hours in Front of Homes/Fosters Site to 8:00 A.M. to 1:00 P.M.
- As a residential community on the waterfront with no substantial protection from the noise of trucks and construction, we must have a period of relief during evening and nighttime hours. During the evening hours (7:00 P.M. to 8:00 A.M.), the noise level at Homes/Fosters wharf must be maintained at residential standards properly adjusted to reflect the general principles of sound attenuation. Noise are perceived as twice as loud (10db louder) than identical daytime noise.
3. Continuing Acoustic and Vibration Monitoring to Assure Compliance with Standards
- It is critical that Federal, state and local limits on construction noise and vibration in a residential community be maintained. As part of an ongoing effort, the Beacon Companies requests access to a continuing record of noise measurements.

6. Continuing Procedures for Construction Dust Control

All contractors on the project must commit to dust reduction procedures--site wetting, covering transported materials and so forth. This must be monitored and enforced throughout the construction period, even in nighttime construction periods.

7. Continuing Resident and Pest Control

Experiences in the Southeast Corridor construction project suggests that any effort of this scale will have serious implications for rodent and pest invasions of the surrounding site. It will be the responsibility of the Federal Highway Administration, the State and its contractors to eliminate the possibility of any such invasion of the Homes/Fosters site or any other site along the waterfront.

3021A

RESPONSE TO COMMENTS BY THE BEACON COMPANIES (AUGUST 22, 1983)

583. During the continuing design stages of this project, the designated representatives of the Beacon Companies will expressly be included through the public participation process to ensure that the development of the Homes/Fosters Wharf area will continue to thrive during the construction phase.
584. The Commonwealth will work with the City and with abutters to improve the quality of the street level plan, including consideration of modifications to the Surface Artery and High Street, and the placement of the ventilation building (see FEIS/FEIR Section 4.4.4 Joint Development.)
585. Pedestrian and vehicular access to the Homes/Fosters Wharf site will be maintained during construction.
586. Decisions about final land use of parcels created over the depressed Artery will result from a planning process initiated by the Commonwealth in consultation with City, community and business representatives. Open space will be considered (see FEIS/FEIR Section 4.4.4 Joint Development).
587. Pearl and Oliver Streets will be extended. The sketch included with these comments is inaccurate: the southbound Central Artery off-ramp emerges at a point south of Oliver Street, as requested in these comments (see Figure 3B in FEIS/FEIR).
588. High standards of urban design and material quality will be used throughout the project, particularly in areas of high pedestrian concentration.
589. Issues of construction phasing will be examined carefully, within the overall constraint of completing the full program in an expedient manner. It is currently planned to complete the Fort Point Channel tunnel as early as possible to allow its use in the excavation process. The design of construction-period mitigation measures will seek to ensure high standards of pedestrian amenity.
590. A total program of construction-program mitigation will be undertaken, as described in the individual subsections of Chapter 4.0 ENVIRONMENTAL CONSEQUENCES.
591. It may not be possible to realign Atlantic Avenue, pending the results of design analysis for a staged program of ventilation. Use of this site for construction staging may be necessary.

66775 (2)

August 1, 1983
Written Comment for the Final Environmental Impact Statement/Report

I believe the state truly has tried to assess every impact from pollution and archeology to neighborhood advantages. Although the later appear to be chiefly a reduction in traffic.

The plans raise another important issue. Why does an undertaking with so many ramifications have a single purpose, the movement of cars?

One of the areas affected, for which future development may be foreclosed, is the Fort Point Channel. This South Station area has been identified as a future Transportation Center. Yet, the opportunity to include water transportation in the Center, may be lost (paved over) for the new artery.

The Fort Point Channel has great potential as a town landing, a marina for pleasure boats, port for working (i.e. lobster) boats, marine services and water taxis to Logan Airport or connecting to both south and north shores and the harbor islands. Here could be the "r's" link to the sea. Complimentary and supportive means of transportation should be included in any plan for cars or not precluded from any future plans for the city.

Second, how will the transportation needs of the South Boston residents be met during construction? Many work in downtown areas and, now, "can't get there from here" because of all the rickety bridges. Will they have to stay home, get a boat from Castle Island or go by way of Dorchester? In other words, will planning be coordinated with the "r's"?

Lois E. Stryker
789 E. Broadway
South Boston, Ma. 02127

(592)

(593)

RESPONSE TO COMMENTS BY LOIS E. STRYKER (August 1, 1983)

592. The possible use of Fort Point Channel for navigation and marine-oriented uses will not be precluded by the project; see Section 4.4.3 Preferred Alternative (re land use impacts - Fort Point Channel). Future plans for water transportation services in this area could be enhanced by the project because of improvements to pedestrian and vehicular access to the Channel. The Preferred Alternative has been refined in the Fort Point Channel area to minimize impacts.

593. Access impacts on South Boston residents during construction will not be significant because the new Herald Street Extension can be completed prior to the closing of Broadway Bridge, and because the West Fourth Street Bridge will be rebuilt (as a separate project) prior to the commencement of this project; see Section 4.4.3 Preferred Alternative (re land use impacts). Extensive coordination with public and private transportation companies will be essential during the design phase to develop and assure adequate transportation services are provided during the construction period.

8 Name "one
Seymour, Massachusetts
August 17, 1983

Robert J. "Digger" Chief Engineer
Mass. Dept. of Public Works
100 Logan Street
Boston, Mass

Dear Mr. "Digger",

Subject: Third Harbor Crossing Tunnel Dismissal

Attached is my indication of the location of a possible extension of the Chelsea River at or near the presently disabled Chelsea Street bridge, the creek being a considerably smaller body of water in contrast to the harbor. Access to tunnel by present exit at two Ra. from E. Boston Expressway, or along unused railroad tracks. In the Chelsea area access to the Northeast Expressway from the tunnel exit (or vice versa) could be achieved by a short cut through the existing along highway, and up Forest Street, then along the station, extending Boston St. east to Marginal Street. Alternatively via abandoned MA-49 tracks which merge into Ninth Street at Carter Street access.

Directly along Forest Ave. to Harbor Ave. exit to Expressway. Directly along Eastern Ave. to Forest Beach Parkway & E. Expressway. Of course the question of ramps, over and underpasses, directions, etc. would be at your discretion, and it appears that whatever your selection of the foregoing alternatives, property acquisitions and business relocations would be quite involved.

The fact is that E. Boston needs a North and South Express which is constructed. Especially if it were to be the present route, it would be a daily to and through Forest and I rate these one of the worst cities for pollution and traffic congestion.

To support my contention that the problem would be alleviated I offer that tunnels from the densely populated Middlesex County area, extending eastward north-south, from the still-growing southern New Hampshire region, would utilize the Chelsea Tunnel route rather than the Callahan and Sumner tunnels. This choice would in turn relieve the pressure at the tunnels and downtown traffic as well, thereby making the Boston tunnels "readily accessible to and from the Airport."

I suggest further that the Chelsea Tunnel be a no-toll project financed by Massport Authority who, obviously, is the real cause of all or most of the pollution and traffic problems of Boston and E. Boston. Particular. Ultimately the improvements will come to Boston's benefit, of course.

Excessive congestion is paramount in order to correct the worsening situation in East Boston. Consider the cross should there be a no-toll Chelsea Tunnel. It would be a considerable improvement in the area, and to E. Boston citizens should a longer distance the other bridge (the bridge) additionally it certainly is not an unlikely possibility.

Another project which requires some delay is improvement in MTA services, for example, connecting the blue and red lines at or near Chelsea St. and connecting the blue and red lines at or near Airport with a spur track

594

595

3) Continue with extension toward the 128. and Lynn, with increase of computer parking facilities
4) Extending the Green Line subway which currently terminates at Park, at Government Center, to continue at least to Haymarket in order that all lines will be interconnected always.
While in Atlanta, Ga. recently, I learned that the Atlanta Rapid Transit System, which was constructed to speed its rapid transit system, has been directed to the circumferential line. This is a direct line from its international airport to its downtown business and hotel area. Whatever prevents a smaller airport station expansion (a large one-mile spur) reading an "instructable".

An additional alternative, as also has been already suggested, is to implement a ferry service between South Station or South Boston and the Airport. Many ferry services in Europe are equipped with railroad tracks to carry full train loads of passengers and freight. Recall during the war, many years ago, I took a passenger on a train from Boston to New York, and the train was a ferryboat between New York, New York, and Sicily.

I believe that the above alternatives in conjunction with the proposed Central Artery Project will eventually do the job that needs to be done.

I am a former East Bostonian who frequently visits friends and relatives in East Boston and South Boston. I own a house in South Boston, near my residence, near the proposed Chelsea Tunnel, or have any interest in any business or venture in metropolitan Boston.

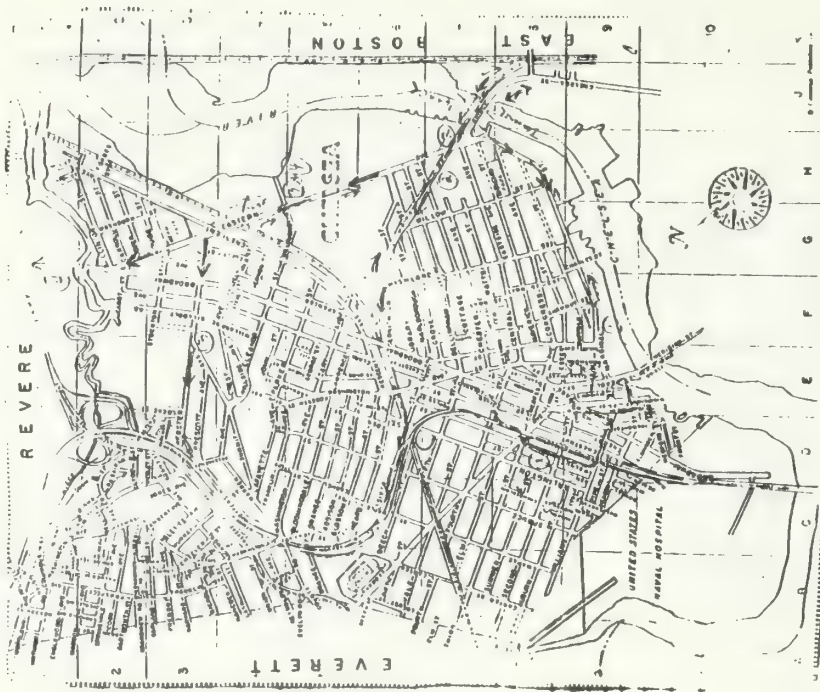
Very truly yours,
Louis Guiliana

RESPONSE TO COMMENTS BY LOUIS GIULIANA (August 17, 1983)

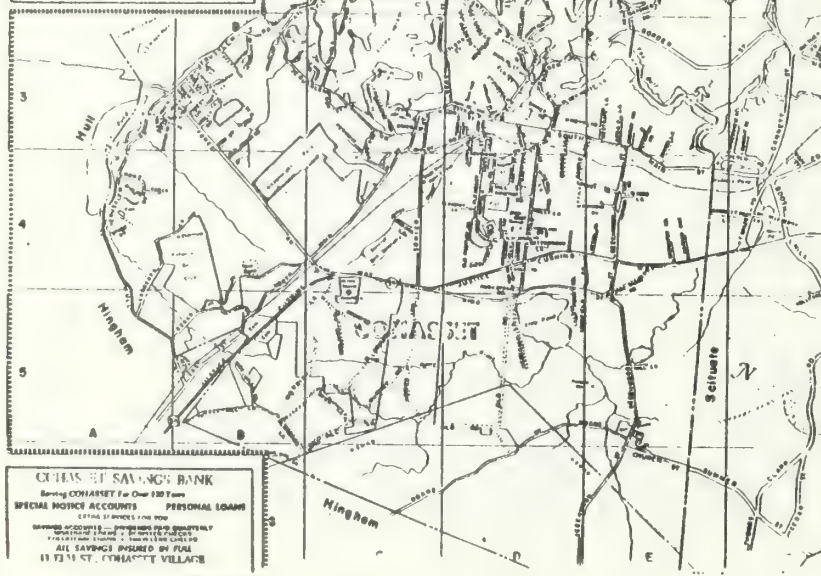
594. The suggestions in your letter for an improved north-south egress through Chelsea and East Boston are noted. It would appear from your description and sketch that significant traffic increases would result on portions of Route 1, particularly north of its interchange with the tunnel you propose in the "unused railroad right-of-way". The Commonwealth has rejected this option, as it does not appear to meet the objectives of the project in improving cross-harbor vehicle capacity and access to the Airport. The implications on the portions of Chelsea and East Boston through which this alignment passes are unknown at this time, although it is expected that major disruptions to these neighborhoods, both during construction and in the long term, would probably result. The proposed Third Harbor Tunnel is a gap in the Interstate Highway System, and would be designated Interstate Route 90.

595. See Sections 1.3 and 4.2 of the FEIS/TEIR for a discussion of the role of public transit.

596. Provision of ferry service will not provide the regional transportation benefits which will be achieved with construction of the proposed project. Direct public transit access between South Station and Logan Airport will be provided via the direct bus ramps from the Third Harbor Tunnel to the South Station Transportation Center. Other transit system improvements, such as those suggested in this letter, could be implemented regardless of the preferred Alternative; the Commonwealth does support continued improvements to public transit services in the area, recognizing that the transit system can not meet all of the transportation demands in the area.



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77 Fenagard Street
Cambridge, MA, 02174
August 18, 1983

Mr. Robert M. Dougherty, Chief Engineer
Mass Dept of Public Works
100 Washington St., Boston, Mass.

Dear Sir:

The proposed Federal subway grant of \$2,000,000.00 to develop the Central Artery and Tunnel project can not be looked upon lightly. Therefore, as a concerned citizen of the Comm. of Mass., I strongly urge the Mass Dept of Public Transportation to readopt the "Alternative 5A" Design Modification plan as proposed in the "In Brief" summary of the Central Artery, by stipulating the Central Artery, by stipulating with a third Artery tunnel.

May I express an opinion, - if at all feasible, provide as much of the existing upper Central Artery as possible. Past experience has proven that we can make more highways to accommodate congested traffic over such as we experience here in our Central Artery region.

I thank you.

Sincerely yours,
D. Ferdinand J. Dinussi
77 Fenagard St. Boston
02174

597

RESPONSE TO COMMENTS BY FERDINAND J. DINUSSI (August 18, 1983)

597. The Alternative 5A Design Modification, with several additional features to those identified in the SDEIS/DEIR and the In Brief article mentioned, has been selected as the Preferred Alternative. Many of the land use and economic benefits to be achieved with the Preferred Alternative could not be realized if the existing elevated Central Artery were left in place. In particular, see Section 4.4.4 Joint Development and Section 4.6.5 Development and Related Fiscal Impacts (specifically relating to benefits from air rights development).



Massachusetts Rehabilitation Hospital

125 Nashua Street, Boston, Massachusetts 02114
Telephone: 617-720-6400

Dedicated to Patient Care, Teaching and Research

August 18, 1983

Mr. Robert McDonagh
Chief Engineer
Massachusetts Department of Public Works
100 Nashua Street
Boston, MA 02114

RE: Statement on the Central Artery/Third Harbor Tunnel
Presented by Massachusetts Rehabilitation Hospital

Dear Mr. McDonagh:

The Massachusetts Rehabilitation Hospital supports and endorses the proposals to construct a third harbor tunnel and to deepen the Central Artery to maintain and enhance the access and egress to the Capital City. We support an improvement in order to make a more efficient and extensive transportation system to and from the City. The proposed project is a massive one which was done as part of a long-range planning program. It is encouraging to know that there is some plan for the access and egress of vehicles projected to the year 2010.

The Massachusetts Rehabilitation Hospital serves patients, not only from the Greater Boston Area, but those to the North, South, and East of the City. The overall improvement in transportation routes will benefit patients referred to us, as well as families visiting those needing to be hospitalized.

Our primary concern is that the proposed tunnel going from Leverett Circle to Causeway Street does not affect the NH property. Preliminary plans show that this will not directly affect our facility.

The Hospital is willing to work and cooperate with any state and federal agencies in order to provide the region with a safer transportation system, and also to improve and enhance the environment within the Boston Area.

Sincerely,

George A. Denariti
GEORGE A. DENARITI
Vice President of Clinical
and General Services

GAD/s

A private not-for-profit rehabilitation hospital affiliated with Harvard Medical School and Tufts University. Scope of services: providing rehabilitation care in the areas of physical, occupational, speech, hearing, vision, and mental health. Services provided on an inpatient, outpatient, and emergency basis. Hospital is a member of the American Hospital Association.

RESPONSE TO COMMENTS BY MASSACHUSETTS REHABILITATION HOSPITAL (August 18, 1983)

598. There are no long-term impacts caused by the project on the Massachusetts Rehabilitation Hospital. During construction, approximately 80 parking spaces during the fifth and sixth years of construction will be temporarily displaced; see Section 4.2.10 Parking Impacts and Section 4.4.3 Preferred Alternative regarding land use impacts and mitigating measures.

Other construction period impacts, such as air, noise, and vibration impacts, have also been considered for the Preferred Alternative at the Rehabilitation Hospital; see Sections 4.7 AIR QUALITY and 4.8 NOISE AND VIBRATION.

598



15 August 1983

Massachusetts Department of
Public Works
Central Artery Section
100 Nashua Street
Boston, MA 02114

Dear Sirs/Madams:

The Boston Society of Architects is pleased to submit its comments on the draft Third Harbor Tunnel/Central Artery Environmental Impact Statement/Report. The proposed project is a major urban development undertaking which should be carefully evaluated in future planning. We are pleased to see the solid technical progress accomplished during the preparation of this EIS/R gives the BSA confidence that most issues can be ultimately and successfully resolved. The BSA believes that a full depressed Central Artery and Third Harbor Tunnel, though potentially disruptive during the construction process, will eventually be a magnificent benefit to the physical environment of Boston. The BSA has been supportive of the general concept and alignment of the proposed Central Artery/Third Harbor Tunnel project. We look forward to fully participating in subsequent design phases with the DPW and EOTC to resolve outstanding issues.

Below are outlined a number of issues and concerns which we suggest need careful attention in the next phases of design and engineering.

1.0 Construction Period Disruption

- 1.1 In a project of this magnitude and duration, disruption is inevitable. The generally proposed construction method of building the depressed Central Artery while maintaining traffic flow above is the key to this project's feasibility. Nevertheless, the North End seems to be especially vulnerable to construction disruption. The BSA believes that the construction phase planning needs to be focused in this area.

2.0 Downtown

- 2.1 The development potential offered by 20 new acres above the depressed Artery Corridor offers the City new opportunities to tie the downtown together again with the waterfront. However, if such development is not controlled properly, new

The Boston Society of Architects

A Chapter of
the American Institute of Architects

120 Newbury Street
Boston, MA 02115
Telephone 417-7017175

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Mass. Dept. of Public
Works, Central Artery
Section
15 Aug. 1983; Page 2

buildings could establish just as great a barrier between the downtown and waterfront as the elevated Artery. Therefore, careful urban design, and zoning guidelines must be established for the development of this corridor.

- 2.2 The designs of buildings now being planned adjacent to the Artery, such as Marketplace Center, Fort Hill Garage and Howe's W, if should carefully be evaluated to see whether they are compatible with the new environment they will inhabit when the elevated Artery is removed.

- 2.3 Ventilation buildings required along the Artery's route should be incorporated into new buildings, if at all possible, and not be designed as free-standing structures. Undoubtedly, Federal joint-development subsidy monies will be required by developers to accomplish this task. Such monies should be set aside for this purpose.

- 2.4 Similarly, Federal joint-development subsidy monies will most likely be required to finance the premium costs of foundations for buildings over the Artery Tunnel. Such monies should be budgeted now.

3.0 South Boston

- 3.1 Open cut sections illustrated in the EIS/R should be fully decked to enhance the environment and development potential of this area.

4.0 Port Point Channel

- 4.1 It is regrettable that the water surface area of the Channel must be reduced by an exposed part of the tunnel tube. If the exposed length or height of the tube top can be reduced to a minimum, the adverse visual impact, the environment of the Channel would be greatly enhanced.

- 4.2 Pleasant pedestrian access for recreational purposes to the Channel's esplanade must not be sacrificed for the sake of traffic design. The Channel offers the City a valuable recreational and visual asset that must be enhanced. Alternative A modified illustrates a new and widened Dorchester Avenue which would limit pedestrian access, and diminish the quality of the environment for pedestrians walking along the Channel's esplanade. Design efforts must be made to diminish the length and width of this surface arterial. We believe that this can be accomplished while preserving the traffic benefits that new Dorchester Avenue would provide.

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5.0 North Station

5.1 A pleasant pedestrian environment along the HDC's Charles River Esplanade must be established and maintained. The anticipated design 2-3 must be further refined to diminish the interference of ramps with pedestrian routes.

5.2 The design of the two proposed low-level bridges across the Charles River should be made as elegant and unobtrusive as possible.

6.0 Project Implementation

6.1 The potential building development on the 20 newly-created acres above the depressed Artery will require close coordination with roadway foundation structures, ventilation building locations, etc. However, at the present time, no single agency has either the jurisdiction, responsibility or expertise to coordinate this development. It is our opinion that a new corridor development agency should be established to coordinate this development. This agency should be responsible for all joint development issues and real estate transactions.

6.2 New zoning by-laws and urban design guidelines will have to be established to govern new development over and immediately adjacent to the Artery.

6.3 Consideration should also be given to drafting a down-zoning ordinance or neighborhood conservation district to protect the North End from potential speculative commercial development.

6.4 Joint development funding will clearly have to be budgeted for foundations, ventilation buildings, decking, landscaping and pedestrian street furniture.

It is hoped that our comments will prove useful. We believe they merit careful consideration in the forthcoming rounds of design refinement. Again, we look forward to working with the DPW, the City and the Commonwealth to resolve unsettled issues. Please let us know how we can be of assistance.

Sincerely,

A. Anthony Zappé

A. Anthony Zappé, President
Boston Society of Architects

cc: Secy. James S. Hoyte
Executive Office of Environmental Affairs

RESPONSE TO COMMENTS BY THE BOSTON SOCIETY OF ARCHITECTS (August 15, 1983)

599. Every attempt will be made to minimize construction period disruptions in the North End and other neighborhoods. Construction techniques and mitigating measures will continue to be studied and refined throughout the subsequent design stages. Extensive public input on staging and detour routes will also be sought during the design phases.

600. The Commonwealth recognizes the importance and complexity of establishing guidelines and procedures for the development of new parcels and ventilation buildings. This process is outlined in Section 4.4.4 Joint Development; both the process and design guidelines will continue to be refined throughout the subsequent stages of this project. The Section 106 Memorandum of Agreement also requires extensive public input to assure the sound development of these parcels, in a manner sensitive to the historic character of the City of Boston.

601. The exact size and location of open sections in South Boston, as well as the possibility of decking over these sections, will continue to be studied throughout the subsequent design phases of this project.

602. The Preferred Alternative represents the least disruptive alignment in the Port Point Channel area; see Sections 4.16 AESTHETIC IMPACTS and 5.2.3 Port Point Channel for a description of the effects of this alignment and the proposed mitigating measures. See also the Section 106 Memorandum of Agreement in COMMENTS AND COORDINATION.

603. See Sections 4.4 LAND USE IMPACTS, 4.16 AESTHETIC IMPACTS, and 5.1.3 Charles River Basin Reservation for a description of proposed mitigating measures and design refinements to minimize adverse effects in this area. Design refinements in this area will continue throughout the subsequent design phases of this project. See also Response No. 555 to the North Station Project Advisory Corporation.

604. Project implementation issues and procedures are discussed in Section 4.4.4 Joint Development. A state-of-the-art development mechanism will be developed to provide future development capability, assist in developer selection, finance some of the public open space improvements, and enforce the design guidelines. The mechanism selected must provide availability of front-end financing, design integration with planning for development permits, and adherence to plans.

EAST BOSTON AREA PLANNING ACTION COUNCIL, INC.

A Member Community Plan A Boston World



91 Berkeley Street, Tel. 587-0871
East Boston, MA 02128

August 8, 1983

Massachusetts Department of Public Works
Mr. Robert J. McDonagh, P.E., Chief Engineer
100 Nashua Street
Boston, MA 02114

Dear Mr. McDonagh:

The East Boston APAC is opposed to the construction of any Third Harbor Tunnel. A tunnel of any kind would encourage the unlimited and uncontrolled growth of Logan Airport and the related services. The effect of this growth would be to increase the surrounding community's traffic volume in the use of the existing infrastructure. This tunnel will discourage the use of public transportation, increase the use of private cars and ignore alternative projects to ease congestion in the two existing tunnels.

The APAC is convinced that the State has not adequately evaluated many potential environmental, social and economic problems created by a Third Tunnel, while ignoring several inexpensive and workable transportation alternatives:

- 605 ***Improved Central Artery and access to existing tunnel traffic
- 606 ***Specify whether Logan should be either a passenger or freight facility and then construct an alternative airport outside the city
- 607 ***Improve public transit and incentives to use it
- 608 ***Extensive ferry network
- 609 ***Cap on Logan Airport growth

R.J. McDonagh

-2-

August 8, 1983

A one billion dollar price tag is too great an expense for a project with too few benefits. Boston is experiencing a widespread regional problem. One that requires multiple solutions. The city's needs are not met by a single purpose Harbor Tunnel.

Those who approve a Third Harbor Tunnel are doing so with little understanding of the effects on the communities both during and after construction. While the proposed tunnel would not require the taking of any East Boston land, it will ultimately encourage the expansion of Logan Airport and further expansion of Logan is an encroachment into our neighborhood.

Sincerely,

Mary Bulcroft
Mary Bulcroft
Secretary of the Board

MB/dmr

RESPONSE TO COMMENTS BY EAST BOSTON AREA PLANNING ACTION COUNCIL, INC. (August 3, 1983)

605. The existing traffic problem in downtown Boston and at the Airport is a two-fold problem resulting from insufficient cross-harbor capacity and Central Artery capacity. Depressing and widening the Central Artery with access improvements to the existing tunnels responds to only part of that problem. See Section 1.1 PURPOSE AND NEED FOR ACTION. Alternative 6, which only widened and depressed the Central Artery, did not provide the level of transportation benefit desired for the region. As such, it was not selected as the Preferred Alternative, but was considered to be much more desirable than the Tunnel-Only Alternatives (See Section 2.4 REASONS FOR NOT SELECTING OTHER EIS ALTERNATIVES).

606. & 609. The Commonwealth will also ask the Massachusetts Aeronautics Commission to act aggressively to develop satellite airports. However, at this time, Logan Airport is the primary air facility serving the Boston area, and is a major reason for the region's continued positive employment and economic profile relative to national economic conditions. Airport growth will continue, with or without improved highway access. See Section 1.3 for a discussion of the project's relationship to Airport growth.

607. & 608. Independently of this project, the Commonwealth has aggressively pursued carpool, vanpool, and other public transportation programs, including those sensitive to the needs of pedestrians and bicyclists. The Preferred Alternative reinforces this transportation strategy, for example, by providing direct high-occupancy vehicle links from the regional highway network to the South Station Transportation Center and Logan Airport. The first of these "remote centers" will be built by the Commonwealth at South Station in conjunction with the South Station Transportation Center project. See Section 1.3 in the INTRODUCTION of the EIS/EIR regarding the Commonwealth's policies toward tripmaking in the area.

Several studies of ferry improvements have been conducted prior to and/or as part of the EIS process and it was concluded that the demand for cross-harbor transportation service could not be adequately met by transit improvements alone; see Section 2.3.5 Pre-EIS Studies.

RECEIVED
AUGUST 3, 1983

August 3, 1983

Mr. Matthew Coogan
Undersecretary of Projects/Developments
Department of Transportation and Construction
One Ashburton Place
Boston, Massachusetts 02108

Dear Mr. Coogan:

As owners and developers of over 500,000 square feet in downtown Boston, Northland Investment Corporation enthusiastically supports the depression of the Central Artery and the construction of the Third Harbor Tunnel.

However, we strongly oppose Alternative 3A as described in the Supplement to the Draft Environmental Impact Statement/Feasibility Study for the Central Artery and Third Harbor Tunnel. The Supplement, dated June 1983, states that Alternative 3A would have an extremely harmful effect on the Fort Point Channel waterway and Boston's waterfront south of Rowe Wharf, especially considering the efforts of public agencies and developers in that area. The Atlantic Building, at 400 Atlantic Avenue, a property currently being rehabilitated by Northland, would, in effect, be a taking with Alternative 3A. Our company would be unable to lease space in the building if prospective tenants were to be vacated after only a few years of occupancy.

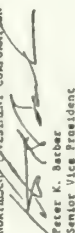
Alternative 3A, on the other hand, sensitively handles Fort Point Channel by placing all new construction below grade, preserves the viability of the recently rehabilitated CSA Building on Atlantic Avenue and permits Northland to continue its rehabilitation and leasing efforts at The Atlantic Building.

Alternative 5 also opens up the Fort Point Channel/South Boston area to new opportunities for growth by linking it directly to Logan Airport.

Northland applauds the efforts of the State to involve all interested parties in the planning for the Artery and Harbor, and we look forward to working with you in the future.

Cordially,

NORTHLAND INVESTMENT CORPORATION


Peter K. Barber
Senior Vice President

pab/b

Real Estate Development - Real Estate Development - Real Estate Management

RESPONSE TO COMMENTS BY NORTHLAND INVESTMENT CORPORATION (August 3, 1983)

610. For the reasons stated in Section 2.4 REASONS FOR NOT SELECTING OTHER EIS ALTERNATIVES, Alternative 3A and Alternative 5 have been rejected. Alternative 5A Modified has been selected as the Preferred Alternative.

Callen

BOSTON EDISON COMPANY
Customer Service
BOSTON, MASSACHUSETTS 02109

G. B. BARNES
BOSTON, MASSACHUSETTS 02114

August 3, 1983

Mr. Robert T. Tierney
Commissioner
Commonwealth of Massachusetts
Executive Office of Transportation
and Construction
Department of Public Works
100 Haynes Street
Boston, Massachusetts 02114

Re: Supplemental Draft EIS/EIR -
Feasibility of Building a Third
Harbor Tunnel and/or Depressed
Central Artery in Boston

Dear Mr. Tierney:

Your letter of July 15, 1983 to Mr. Stephen J. Sweeney, Executive Vice President, has been forwarded to me for reply and action. Thank you for the information concerning this major project. The Company has now obtained copies of the Environmental Impact Statement/Reports described in your letter and is in the process of reviewing them. I have been designated as the Company's official responsible for coordinating our involvement in this project. I request that all future correspondence and information be sent directly to me.

Based upon our preliminary review of the reports, it is apparent that there will be a significant impact upon both our electric and steam facilities in the affected area and streets. As you are undoubtedly aware, the Company is required by law (Acts 191, c. 271, as amended by Acts 1975, c. 240) to maintain underground electric facilities in the City of Boston. Consequently, the proposed project will require us to perform the necessary engineering and construction, if we are to maintain the continuity of electric and steam service to our customers in this section of the City. While the depression of the Central Artery and the Third Harbor Tunnel is undoubtedly for the general good, we must be reimbursed for the substantial cost we will incur through the loss or relocation of our existing electric and steam facilities. Finally, I must request that the Company be permitted to discuss and comment upon the planning and details of this project as it proceeds. Your assistance and cooperation in this regard are essential.

Very truly yours,

CD Daniel

cc: Mr. Stephen J. Sweeney

RECEIVED
AUG 5 - AM 10 16

RESPONSE TO COMMENTS BY BOSTON EDISON COMPANY (August 3, 1983)

611. The timing of utilities relocation will be defined during the design phase of the project. Sufficient time will be allowed for this relocation operation. Utility relocations which are a direct result of the project are eligible for reimbursement. Participation by all interested or affected parties will be encouraged and sought during the design phase.

611



463 Shawmut Ave.
Boston, MA 02118
August 10, 1983

Mr. Robert McDonough
Chief Engineer
Mass. Dept. of Public Works
100 Nassau St.
Boston, MA 02114

Dear Mr. McDonough:

I strongly support the reconstruction of the Central Artery underground. With the burgeoning development of Boston's downtown and the expected increase in traffic to Logan Airport, there is no doubt that this already overburdened road needs improvement. Additional lanes and, just as importantly, breakdown lanes are essential. Also, the entry and exit ramps need to be rearranged to reduce weaving patterns. Slurry in order to improve the Central Artery and the Harbor Tunnel probably need to be demolished anyway it makes sense to give the whole highway underground. This will add acres of new downtown land for development and remove an eyesore to the downtown.

The important element to remember when budgeting for this project is how important minimizing construction disruption will be. Ten years of construction, particularly in a downtown area, is a tremendous burden on the city. It is difficult or if the area is choked with construction dust and debris. Sufficient funds should be budgeted towards techniques for minimizing this disruption.

While I wholeheartedly support the construction of a depressed Central Artery, I am not so supportive of the Third Harbor Tunnel. My main concern is it really necessary?

The existing tunnels see 15,000 vehicles a day with room for more if the artery did not cause back-up. The Tobin Bridge also can hold more traffic if the Artery provided adequate means to get there. The most preferred tunnel — the seaport access tunnel — goes primarily to the airport and will be used only by people coming from the south and west since the other tunnels provide shorter routes for others. The existing tunnels are not congested and the seaport access tunnel does this amount of traffic at the cost? In twenty years will we be glad the third tunnel was built?

Other alternatives for the tunnel are even worse but for other reasons — they disrupt residential neighborhoods, particularly East Boston. Even the most preferred alternative may cause some problems for the South End if the East Berkey exit is maintained. Entry and exit ramps onto Herald St. artery should be rebuilt up to the level of the existing highway to provide a pleasant alternative route to the airport. But is it worth the cost?

Sincerely,

Cheryl McCarter
Cheryl McCarter

RESPONSE TO COMMENTS BY CHERYL MCCARTER (August 10, 1983)

612. Alternative 6 is less desirable than the Preferred Alternative for the reasons discussed in Section 2.4 REASONS FOR NOT SELECTING OTHER EIS ALTERNATIVES. It is not as effective as the Preferred Alternative in reducing congestion and vehicle hours of travel, and would not adequately serve time-sensitive movement of goods (and people) to the Airport. Alternative 6, however, is significantly more desirable to the Commonwealth than any of the tunnel-only alternatives.

613. The ramps in the South Bay area as shown for Alternative 5A have been significantly reconfigured to eliminate direct access onto Albany Street; a new Herald Street Extension has been included in the Preferred Alternative. The Herald Street Extension and relocation of ramps will cause a decrease in traffic on local South End streets; see Section 4.2.2 Traffic Volumes.

The Boston Preservation Alliance

An Association of Preservation Organizations
P.O. Box 1196, Boston, Massachusetts 02103

Phone: 617-262-3636

August 9, 1983

Mr. James A. Walsh
Division Administrator
Federal Highway Administration
Transportation Systems Center
55 Broadway, 10th Floor
Cambridge, MA 02142

Dear Mr. Walsh:

The Boston Preservation Alliance welcomes the opportunity to comment on the Environmental Impact statement and its supplement for the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93. As a coalition of historic preservation organizations in the City of Boston, the Alliance has deep concerns for issues such as this that affect the built environment and the well being of Boston's citizens. The Alliance appreciates the scope of this project whose objective will undoubtedly result in better transportation for the city and the region.

However, the Alliance opposes certain aspects of this project which will have negative impact on historic resources in the central city and beyond. The first is the proposed widening of the Third Harbor Tunnel. The widening of the Tunnel will result in the loss of a historic body of water (and potentially eligible for the National Register of Historic Places), the Fort Point Channel is the last remaining body of water that defines the old Shawmut Peninsula. The Channel will be severely compromised unless modifications to this project are made. The only alternative that the Preservation Alliance could support with modifications would be number 1A. The other alternatives diminish the Channel drastically because of the introduction of ramps and roadways on the surface. The Alliance opposes the widening of the Tunnel and of the new northern venue projects into the Channel under alternative 1B. The widening of the Channel will result in the loss of the Channel. The Alliance would also like to see the roadway at the head of the Channel made entirely inaccessible. Associated with this project is the building of a fixed span bridge to replace the current Northern Avenue Bridge. The history of this bridge will be too low to allow sailboats to pass through. The Alliance believes that this will have a negative impact on the Channel as a recreational facility.

Second, the Alliance is concerned about the traffic impact of the project on the South End during and after construction. The Alliance believes that Herald Street should be widened in order to help alleviate the huge flow of vehicles predicted to pass through this National Register district, which is also the largest Victorian residential neighborhood in this country.

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Letter to Mr. Walsh
Page 2

The Alliance is concerned about certain impacts of the proposed depression of the Central Artery. They are as follows:

- a) the effect on adjacent historic buildings and areas (such as the North End) during and after construction,
- b) the placement of vents and any other structures associated with depression,
- c) the disposition of the surface area left after the project is completed.

The Alliance feels that a feasible answer must be formulated to address these concerns and that a proper review process (such as the 106 review) should be applied with full vigor. Again, the Alliance is thankful for the opportunity to comment on this project.

Sincerely,

Sam C. P. Park
Sam C. P. Park
Chairman

Robert A. W. Davis
Robert A. W. Davis
Executive Director

cc: Mr. Robert J. McDonough, Mass. Dept. of Public Works
Mr. James Lyette, Secretary of Environmental Affairs
Mr. James Lyette, Secretary of Environmental Affairs
Mr. Valerie Fain, Massachusetts Historical Commission
Mr. Frederick Salvucci, Secretary of Transportation
The Honorable Michael S. Dukakis, Governor
Mr. John Vicigliese, Traffic Commissioner, City of Boston
Mr. Robert Rym, Boston Redevelopment Authority

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RESPONSE TO COMMENTS BY THE BOSTON PRESERVATION ALLIANCE (AUGUST 9, 1983)

614. The Preferred Alternative will have impacts on the Fort Point Channel, because the inclusion of a northbound Dorchester Avenue is a critical component of the transportation system improvements. As described in Section 4.16 AESTHETIC IMPACTS and Section 5.2.3 Fort Point Channel District, however, the Preferred Alternative incorporates the least disruptive design of a tunnel in the Fort Point Channel District. Mitigation measures have been developed with the consultation of the Massachusetts Historic Commission and the Boston Landmarks Commission, and a Section 106 Memorandum of Agreement has been executed (see COMMENTS AND COORDINATION).

615. The Northern Avenue Bridge is not part of the Third Harbor Tunnel/Central Artery project. However, the MDPW is currently reviewing the Northern Avenue Bridge in a separate design process.

616. The provision of a Herald Street Extension and shifts in ramp locations will reduce traffic on local South End streets; see Section 4.2.2 Traffic Volumes. The widening of Herald Street (west of Albany Street) is being undertaken as a separate project by the City of Boston (see Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE).

617. As specified in the Section 106 Memorandum of Agreement which is included in COMMENTS AND COORDINATION, the project will not cause negative impacts to the buildings or districts adjacent to the Central Artery (with the exception of the Causeway/North Washington Streets District). Mitigating measures have been incorporated into the Preferred Alternatives.

618. The impacts of ventilation buildings and measures to mitigate impacts are discussed in Section 4.7.5 Effects of Ventilation Building Emissions and throughout Section 4.16 AESTHETIC IMPACTS. Extensive design refinement is necessary on these structures, which will occur during the design phases of the project.

619. Disposition of surface parcels is addressed in Section 4.4.4 Joint Development. The Section 106 Memorandum of Agreement also addresses this issue.

620. A Section 106 Memorandum of Agreement has been prepared and submitted to the President's Advisory Council on Historic Preservation. Representatives of the Boston Preservation Alliance were involved in the Section 106 review process.

ELLIS NEIGHBORHOOD ASSOCIATION, INCORPORATED
52 Chandler Street Boston, MA 02116 542-5891

August 4, 1983

Mr. Robert J. McLaughlin, Chief Engineer
Massachusetts Department of Public Works
100 Railroad Street - Room 350
Boston, MA 02114

Dear Mr. McLaughlin:

SUBJECT: Draft Environmental Impact Report Third Harbor Tunnel Project, Interstate 90 and Supplement to Draft Environmental Impact Statement/Report Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 95

Please consider the comments hereto submitted by the Ellis Neighborhood Association, Inc. with respect to traffic impacts as a result of artery and tunnel build alternatives.

The conflicts between neighborhoods and vehicles on local streets arise primarily from the large numbers of vehicles. Vehicular congestion is a growing pressure, which threatens to erode the livability of our neighborhood. The Ellis Neighborhood Association has been working to prevent such a situation from occurring. Situated as a gateway to the Downtown and Back Bay, the South End serves as a transition area for many drivers who use its streets both in creative and radial directions.

Both the Draft EIS/DES and the Supplement to the Draft EIS/DES fail to include existing and future traffic volumes on local South End streets in the analysis of the impacts of the various tunnel alignments and the Central Artery depression. Construction of a third harbor crossing and reconstruction of the Central Artery will result in increased traffic to South End streets from the North End as well as the South End. The Draft EIS/DES and Supplement to the Draft EIS/DES fail to consider the impact of the proposed changes on the Ellis neighborhood by East Berkeley Street to Berkeley Street. Traffic out of Back Bay bound for the airport and other northern points will use South End streets to reach the tunnel entrance. Moreover, increased traffic volumes from the Southeast Expressway will add to East Berkeley Street congestion. As for outbound traffic, some drivers use a congested Herald Street, but many others try to bypass the toll by entering onto residential streets such as Clarendon Street, which runs through the Ellis neighborhood.

South End support for a build alternative, including reconstruction of the Central Artery, would be contingent upon eliminating the north and south on-off ramps from the Southeast Expressway at East Berkeley Street, replacing them with southbound ramps at Herald Street, and constructing a widened two-way Herald Street with a northbound Back Bay connection to serve Berkeley, Clarendon and Berkeley streets. An expanded two-way Herald Street above the railroad tracks would be a significant improvement, if a decision to go forward with a third tunnel and depress the Central Artery.

621

Ellis Neighborhood Association, Inc. comments
August 8, 1983
p. 2

I plan to improve the level of traffic service to the city should act, as a consequence, create an increased flow of vehicles on local South End streets. We, therefore, urge that the aforementioned map realignment and Herald Street improvements be incorporated into the planning for a third tunnel and a depressed Central Artery.

Very truly yours,

ELLIS NEIGHBORHOOD ASSOCIATION, INC.

Carolyn A. Oatley

Carolyn A. Oatley

Chairman

Office for

James J. Walsh

Secretary James J. Walsh

Chairman John A. Vitagliano

RESPONSE TO COMMENTS BY THE ELLIS NEIGHBORHOOD ASSOCIATION, INC. (August 8, 1983)

621. As requested by South End groups and others, the provision of a Herald Street Extension and the relocation of on- and off-ramps in the Preferred Alternative will result in the reduction of traffic on local, residential streets; see Section 4.2.2 Traffic Volumes for a description of traffic impacts. Additional improvements to Herald Street, such as widening the street above the railroad tracks, is beyond the scope of this project and is being pursued by the City of Boston (see Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE).

66-725

102 Waverly Street
Dorchester, MA 02119
August 14, 1983

Honorable Frederick Salvecci,
Secretary of Transportation,
One Ashburton Place
Boston, Massachusetts

Dear Mr. Secretary:

I would like to express my opinions regarding the Third Harbor Tunnel and the Central Artery. I am concerned for the Port Point Channel because water is an irreplaceable urban resource and amenity.

I know the problems with transportation are great, but there are alternative ways to solve our transportation problems. Expanded public transportation is a high priority. And Boston Harbor has tremendous potential for a transportation network. The shortest distance between Commonwealth Pier and the Fish Pier and Logan Airport is not through downtown Boston. People and air freight out of Logan could be shipped cross harbor.

I do want to see the ugly Central Artery depressed but not at the expense of this unique urban irreplaceable Channel. The area along the Channel could be renovated for recreational and marine uses. It is also important aesthetically: it provides pleasant views and breathing space in an area that promises to become highly congested. Your consideration of these views will be appreciated by the present as well as future generations.

Very truly,
cc: Gov. Michael Dukakis *Florence B. Patterson*
Robert McDonough, Public Works Dept.

622

623

RESPONSE TO COMMENTS BY FLORENCE B. PATTERSON (August 14, 1983)

622. See Sections 1.3 and 4.2 for a discussion of the role of public transportation in this project.

623. Impacts on Port Point Channel, and mitigating measures to reduce these impacts, are discussed in Section 4.16 AESTHETIC IMPACTS and in Section 5.2.3 Port Point Channel District. The Preferred Alternative incorporates the least destructive design of a tunnel in Port Point Channel, which also meets the transportation requirements of the region. The alignment of the cross-harbor tunnel also minimizes construction in the Harbor. Extensive planning and design refinements have occurred to minimize the impacts of the project. These efforts will continue, with public input, throughout the design phases and into the construction phases.

BIF-DARC Comment Letter
Third Harbor Tunnel

Mr. James A. Walsh, Division Administrator
Federal Highway Administration
Transportation Systems Center
55 Broadway, 10th Floor
Cambridge, MA. 02142

Mr. Robert J. McDonagh, Chief Engineer
Massachusetts Department of Public Works
100 South St., Room 330
Boston, MA. 02114

Reference: FHWA-MA-EIS-82-02-DS

Dear Sirs:

I am writing to you as a chairperson of the Bird Island Flats Design Advisory Review Committee to report the conclusions of the Committee's evaluation of the Draft EIS which proposes the construction of a third harbor vehicle tunnel. BIF-DARC is an ongoing committee which reports to the Massport Board made up of community representatives, urban designers, landscape architects, architects, representatives of the air cargo industry, residents of the waterfront, and other interested parties. The Committee is charged with the task of advising on the development of this portion of Logan Airport. As such, the group is intensely interested in the proposed roadway, and has serious concerns regarding its negative and positive effects on the site.

Overview

The proposed SA modified plan with its alignment on the East Boston side of Bird Island Flats, has the most dramatic impacts on the adjacent Mass Tech Center which is in its first phase of construction, and the Air Cargo terminal areas which are shortly to begin construction. For these reasons, the Committee would like to restrict its comments to impacts of the SA modified alternative. Because of conflicting positions among committee members, the group feels it is inappropriate to make recommendations on the proposed alternative. BIF-DARC has previously limited its comments to positive and negative impacts of major concern which the group feels should be addressed if the project proceeds through final design and construction.

BIF-DARC Comment Letter
Third Harbor Tunnel
Page Two (2)

Issues

1. Vent Shaft

The proposed vent shaft, sited near the edge of the harbor on Bird Island Flats, must be positioned and designed to minimize aesthetic and air pollution impacts on both the air cargo buildings and the mixed use development. Further, the proximity of the shaft to the waterfront requires that the design respond to its waterfront location. As a dominant architectural feature of the future landscape and waterfront, this vent shaft will have a significant impact on the city from the airport and the view from Jeffries Point toward the outer harbor. The height, location, and design of the vent shaft are of particular concern.

2. BIF-Tunnel Access

Traffic seeking to reach the Bird Island Flats mixed-use area and the proposed building is forced, under Alternate SA Mod., to travel the access airport roadway to reach the Bird Island Flats access road. The trip from the point where a motorist or trucker enters the airport roadway to the Bird Island Flats road may well exceed the trip from tunnel entry at South Boston to the airport road. This seems unreasonable, especially when one considers that the Bird Island Flats development area will be the most impacted area of the airport development. The mixed-use development will expect that their airport location near the tunnel mouth will give them the benefit of quick access to the Massachusetts Turnpike and other destinations on the Boston side of the harbor. This value may well be the factor which induces them to tolerate impacts during the construction period. Some design solution must be found to dramatically improve the completed access. It should also be noted that parking limits on Bird Island Flats are precise and cannot be violated.

3. Construction Impacts

The proponent's plans for construction staging describe a staging area near the edge of the harbor and three sequential cut and cover sections to reach the airport roadway. The construction period is anticipated to last for five years.

This construction will take place within a stone's throw of both the air cargo area and the mixed use area of the Bird Island Flats development.

RESPONSE TO COMMENTS BY BIRD ISLAND FLATS - DESIGN ADVISORY REVIEW COMMITTEE
(undated)

4624. The effects to air quality from the ventilation building at BRP is discussed in Section 4.7.5 Effects of Ventilation Building Emissions. A sensitive design of the building's appearance to minimize impacts and to maximize compatibility with the air development will be pursued during preliminary design. See Section 4.16 AESTHETIC IMPACTS.

425. Access to AIP from the Airport roadway system is described in Section 4.4.3. Referenced Alternative (re land use impacts, Logan Airport). As noted in that section, the present design does not afford the desired AIP access. The Commonwealth is sensitive to this concern, and will pursue design refinements at the Airport to improve access to BIF during the preliminary design phase. See also responses to comments by Macomber Associates, Massachusetts Technology Center, concerning this issue.

6.6. Construction period impacts on IIF will be mitigated by strict enforcement of noise, dust and air quality standards and construction specifications. The BIF access road will be open at all times and construction traffic will be segregated from other traffic; see Section 4.4.3 regarding land use impacts, and Section 4.1 DESCRIPTION OF CONSTRUCTION.

6.66. Construction period impacts on air will be mitigated by strict enforcement of noise, dust and air quality standards and construction specifications. The Air access road will be open at all times and construction traffic will be segregated from other traffic; see Section 4.1 DESCRIPTION OF CONSTRUCTION IMPACTS AND SECTION 4.1 DESCRIPTION OF CONSTRUCTION RELATED LAND USE IMPACTS.

Sincerely,
David Aron

Greater Boston
Chamber of Commerce
125 High Street
Boston, MA 02110
Tel. 426-1240

Mr. Robert J. McDonough
Chief Engineer
Massachusetts Department of Public Works
100 Main Street
Boston, MA 02114

Dear Mr. McDonough:

On August 8, 1983 I, as President of the Greater Boston Chamber of Commerce, testified at the Corridor Public Hearing for Central Artery, Interchange Area 9B in Boston. At that time I explained that the Chamber of Commerce had a Task Force of prominent business leaders assisted by a Technical Advisory Committee of specialists competent to evaluate the various aspects of the proposals. The magnitude and complexity of the proposals required that a thorough analysis of the various options be made to ensure that the final decision best addressed the needs of the Commonwealth. Because of the scope of the project and the limited time, the Technical Advisory Committee was unable to complete its review of the proposals by the deadline for the public hearings. I indicated that the Chamber's written comments would be submitted before the August 22, 1983 deadline.

The enclosed statement of the Board of Directors' position was unanimously approved at a meeting on August 17, 1983. The position is based upon the Technical Advisory Committee's analysis of the various alternatives under consideration. I have enclosed a copy of that analysis to be included in the Chamber's comments on the Draft EIS and the Supplemental EIS. I have also enclosed a list of the names of the members of the Technical Advisory Committee (attachment A) and a list of the members of the Technical Advisory Committee (attachment B).

The process by which the Chamber's Board established its position has led to an objective analysis which I believe will be a significant contribution to both state and federal authorities evaluating this important project.

Sincerely,

James L. Sullivan

Attachment

cc Governor Michael S. Dukakis
Secretary of Transportation and Construction Frederick Salvucci

James L. Sullivan
President

August 18, 1983

Greater Boston
Chamber of Commerce
125 High Street
Boston, MA 02110
Tel. 426-1240

August 17, 1983

The Board of Directors of the Greater Boston Chamber of Commerce endorses both the construction of a third harbor tunnel and the depression of the Central Artery as the most complete solution to the region's transportation and traffic problems. Specifically, we support Alternative 3A Design Modification with the Fort Point Channel Preservation Design Refinement. This alternative provides for the depression of the Central Artery and construction of a Support Access Road running easterly from the Harbor Tunnel to the Central Artery. Construction of the Support Access Road will allow for the removal of the Central Artery from the area under Logan Airport. The Channel Preservation Design Refinement, which involves two tunnels under Fort Point Channel - one serving as part of the seaport access route, the other serving as the northbound section of the Central Artery - addresses the concerns of the Gillette Company, preservation groups and developers in the area.

Support for this alternative is based upon an expectation that, if funding for the project is approved, construction of the Support Access Road will be completed prior to the depression of the Central Artery - will be substantially completed during the design phase. These concerns go far beyond traffic and transportation issues and include the economic hardships incurred by the impact on current and future development in the area, the amount of land required and the congestion created. The Chamber's Technical Advisory Committee has analyzed these concerns in its report on the Third Harbor Tunnel/Depressed Central Artery proposal.

The Technical Advisory Committee was created to assist a Chamber-appointed Task Force of prominent business leaders which evaluated the various aspects of the proposals. The magnitude and complexity of the project required that such an analysis be made to ensure that the final decision best addressed the needs of the Commonwealth. It is upon the findings of this Task Force and the analysis of the Technical Advisory Committee that we base our position in support of Alternative 3A Design Modification with the Fort Point Channel Preservation Design Refinement.

RESPONSE TO COMMENTS BY GREATER BOSTON CHAMBER OF COMMERCE (Technical Advisory Committee Summary Report) August 19, 1983

627. The "Channel Preservation Design" worked out with the affected community has been incorporated into the Preferred Alternative. It does not assume that land would be "gained back" from the Postal Service. Rather, the Commonwealth has agreed, as indicated in the Section 106 Memorandum of Agreement, that the new Dorchester Avenue design will minimize encroachment into the Fort Point Channel and onto Postal Service property. During the design phase of the project, if the need arises for use of a portion of the Postal Service property for construction of the new Dorchester Avenue, this would be pursued at that time.

628. We concur with the Chamber's Committee on this issue. Improving connections between the South Station Transportation Center (SSTC) and the new tunnel system has received extensive study in the FETIS/FSTR. Bus ramp connections have been developed from the SSC to the new system which will directly connect South Station to the Airport and, in so doing, link the Airport directly with the mass transportation network. As noted in Section 1.3, the Commonwealth is creating the first remote airport ticketing facility at South Station as part of the SSC project.

Attachment A

THIRD HARBOR TUNNEL
DEPRESSED CENTRAL ARTERY TASK FORCE

Task Force Chairman
Harold Hestess
Senior Vice President
Senior Partner
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742-9100

Chairman
Kenneth M. Rozzano
Chairman, Boston Chamber of Commerce
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John Larkin Thompson
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956-3400

Attachment B

TECHNICAL ADVISORY COMMITTEE MEMBERS

Phil Bonanno
President & General Manager
J.F. White Contracting Co.
Boston, MA

James Brown, Economist
Director of Joint Center for Urban Studies
Cambridge, MA

Bruce Cabell
New England Regional Manager
T.A.M.S., Inc.
Boston, MA

Harry Foden
Vice President
Arthur O. Little, Inc.
Cambridge, MA

Donald Goldberg, Geotechnical Engineer
Principal
Goldberg, Taliso & Associates, Inc.
Upper Boston Falls, MA

Kevin Lynch, Planner/Urban Design
Principal
Carr Lynch Associates
Cambridge, MA

Samuel Nantz, Architect/Planner
Principal
Nantz Associates Architects/Planners, Inc.
Boston, MA

John Priestly
Architect/Developer
Boston, MA

William Rizzo, Environmental Planner
Principal
Rizzo & Associates
Framingham, MA

Steven Verda, Structural Engineer
Principal
Verdinger & Associates Engineers
Cambridge, MA

Greater Boston Chamber of Commerce
TECHNICAL ADVISORY COMMITTEE

Third Harbor Tunnel, Interstate 90/Central Artery Interstate 91
SUMMARY REPORT

OPENING STATEMENT

To the great credit of the DeMaris Administration and the leadership of its Secretary of Transportation, Frederick Salvucci, we have before us the first creative comprehensive attack on the Boston Region's long range vehicular transportation problems.

We recognize that because of the September 30, 1981 deadline set by the U.S. Congress that the Transportation Task Force report on its recommendations and request for funding. Considering this shortage of time to develop and a new Seaport Access Road, along with a depressed Central Artery plus additional alternatives for the Third Harbor Tunnel, makes this Supplement to the Draft Environmental Impact Statement/Report even that much more impressive.

We want to thank the Greater Boston Chamber of Commerce, under the leadership of James L. Sullivan, for its leadership in the formation of the Transportation Task Force and its Special Transportation Task Force, in coming to grips with a unified business community recommendation on a subject as complicated and as far-reaching as this Draft EIS/R encompasses. Keeping in mind the Chamber's previous positions in support of a Third Harbor Tunnel, its willingness to be open-minded to allow our Technical Advisory Committee the freedom of expression to make recommendations on the subject, and its willingness to take a rational, careful, thoughtful position at the most recent point of view, in the last several decades.

1. APPROACH

The TAC approach is based on a review of the Draft EIS/R and Supplemental Draft EIS/R, not on independent investigations. We find the Draft EIS/R in an excellent, comprehensive document. We also recognize that it is not possible to cover all answers to every issue, even in a Document as well put together as this one is. The thrust of our analysis was not to that supported the Chamber's position as if the hard data was there, and in a form that supported the Chamber's position. Furthermore, all of us being technical professionals and familiar with the level of data and depth that's possible to include in a Draft EIS/R, and conscious of the fact that greater data, greater depth, and variations as alternatives are all part of the next Design Phase, we found no problem with putting forth our recommendations to the Chamber's Transportation Task Force.

-1-

Third Harbor Tunnel, Interstate 90/Central Artery Interstate 91
Page 2

2. OVERVIEW

There are two critical roadways involved in improving present traffic and transportation conditions in the Boston Region:
THT (Third Harbor Tunnel)
CA (Central Artery)

These roadways are inseparable when considering future traffic and transportation conditions since each, by itself, does not solve the overall problem.

When the TAC was assembled, some members favored only a THT, others only a CA, some both and some neither.

Through our discussions and exchange of views and technical knowledge, we all members of the TAC favor a THT, Third Harbor Tunnel, with a Seaport Access Road, (whose alignment with the THT is the "modified" Alternative 3A on an alignment worked out with the help of Gillette, etc.) Others concerned with the preservation of the Fort Point Channel, as well as major improvement to the Central Artery, which we recognize can be depressed.

We see the need to build the THT first to take pressure off the CA during its reconstruction, but we believe that either the THT or the Depressed CA alone answers the needs of the Boston Region.

We share the concern of the Chamber about the disruption impact on Boston's economy, and the quality of life during the long period, approximately twelve years, that it is estimated to take to carry out the reconstruction of the Central Artery. Furthermore, we recognize the Chamber's skepticism and apprehension over whether this twelve year period is not optimistic because of the complexity and scope of the undertaking, and the difficulty of giving assurance about a construction process, that while technically sound, will not be subject to the usual construction problems, labor shortages, labor contracts and strike problems, and unanticipated materials delays.

3. RECOMMENDATIONS

A. THT Third Harbor Tunnel

We consider that the most desirable alternative would be Alternative 3A Modified for the THT and further modified to assure Gillette its water needs, and to have less visual impact on the Fort Point Channel which is ripe for development, as well as improvement in its pedestrian use and potential for more boating activity.

This alignment offers the greatest benefits to South Boston by removing heavy truck traffic from local streets and enhancing the waterway. The proposed facility contemplated from the Fort Point Channel to the expanded Seaport container facility. It also avoids impacts on the East Boston Community.

C. Central Artery

- (1) Objectives
Major improvements of the CA are necessary, but widening of the present elevated structure is not an acceptable alternative. We concur that a depressed CA is more desirable from many of the aspects we have considered than an elevated structure. It should be accomplished with a serious construction impact as measured by the length of the construction period and the disruption of the City's business and residential life. The business district, as well as the North End business and residential community, there should be flexibility for future development including mobility of traffic and pedestrians, building masses, views and general land use. All these should be enhanced. Environmental improvements should be possible and appropriate to the North End area. The City's considerations, not only for the large retailers like Jordan Marsh and Filene's, but the many small businesses in the Downtown, North End, and Waterfront.

CLOSING STATEMENT

It has been extremely difficult in the short time that we on the Technical Advisory Committee (TAC) have had to thoroughly evaluate all aspects of this monumental Draft EIS/R and Supplemental Draft EIS/R; and without our previous knowledge and expertise in our subject of specialization, we could have never been able to intelligently advise the Chamber of Commerce's Special Committee on Transportation. We believe we have given a coherent, impartial series of recommendations to the Chamber's Special Transportation Task Force. We also recognize that the Chamber's past pronouncements have only been in support of a Third Harbor Tunnel, but that it was agreed that we on the TAC could have the independence to review and recommend as we saw fit. The Chamber, of course, is under no obligation to accept our recommendations.

We can say with complete wonder and after thorough examination of the document, plus considerable discussion and debate between members of the TAC that our recommendations are made taking into account the seriousness and far reaching implications of such a massive construction undertaking. Furthermore, we recognize the importance of the Business Community's support. Through its Greater Boston Chamber of Commerce, to success of any future transportation improvement for the Boston Region.

We respectfully submit our recommendations for your consideration, discussion, debate, and we hope, your adoption.

Samuel E. Miaz, TAC Chairman

B. SAR Seaport Access Road Connection

We concur that a Seaport Access Road Addition to the Third Harbor Tunnel is a significant improvement.

The inclusion of a Seaport Access Road as part of the TMT in this Supplemental Draft EIS/R is the most innovative addition to the previous Draft EIS, on the TMT Third Harbor Tunnel and the Secretary of Transportation is to be commended for its inclusion.

- (1) The SAR takes traffic to and from the Boston Marine Industrial Park, an expanded Massport Container Facility, the Fish Pier, BOSCOM on Commonwealth Pier, and the proposed Athanas, CC & P and Rose Associates developments, and removes most of it from the surface streets of South Boston.

- (2) This SAR provides direct linkages to Logan International Airport via the Expressway, or to the other important areas along the South Boston waterfront as enumerated in item 1 above.

- (3) It will probably encourage a stepped-up timetable for the development of the Athanas, CC & P and Rose Associates development.

- (4) We understand that discussions have taken place with Gillette and with Preservation/Conservation and Harbor Organizations concerning the Seaport Access Road Tunnel crossing of the Port Point Channel in front of Gillette, the Northbound roadway of the Depressed Central Artery, and the Depressed Avenue surface roadway attention. From these discussions a variation called the Channel Reservation, a road tunnel deeper and complete, which is to be constructed in front of Gillette, leaving their Channel, freightage available for development; second, places the Northbound roadway of the Depressed Central Artery deeper into the Channel and only seen at high tide in the Seaport-Congress Street area; third, gains back from the Port Office a portion of existing Bernecker Avenue, which is to be widened, mainly out into the Port Point Channel and supported on some form of viaduct construction.

- (5) One area that deserves further study and attention is better linkage of the SAR and TMT with the South Station Transportation Terminal. Since the South Station Transportation Terminal will become a hub of AMTAX rail, commuter rail, Interstate bus, New England bus and commuter rail, the potential of some form of special improved transportation link, and from the airport to the South Station, and from the South Station to the TMT, the idea of airline ticketing and baggage check-in at South Station is not out of the realm of possibility.

Gillette has identified a number of design and construction criteria as well as administrative and legal arrangements which can reasonably mitigate the negative impacts on Gillette's property and interests. The following are the criteria and arrangements which are acceptable to us so long as Gillette is made part of the process of design and construction for these aspects affecting Gillette and so long as the interim and final designs are reviewed and agreed to by Gillette. Gillette requests that the Massachusetts Department of Public Works (MDPW) make a formal commitment to adopt the specific mitigating criteria and measures that are listed in detail in Section 3.0 of this document. The criteria for mitigating the impacts on Gillette and the Port Point Channel are summarized as follows:

- 629 • Highway construction in Port Point Channel to be avoided if possible. If not, highway construction in the Channel to be below the Channel bed. The top of the Saseport Access Tunnel to be at or below the present (interior) of our cooling water intake.
- 630 • No net loss of Gillette waterfront nor net loss of area of Gillette property.
- 631 • Dorchester Avenue not to be relocated further east than its present alignment adjacent to Gillette's property.
- 632 • Maintain or improve water quality and temperature in Port Point Channel.
- 633 • Intake for Gillette's cooling water system to be relocated on Gillette-owned shoreline and entirely reconstructed, at no expense to Gillette, if relocation is necessary. Intake pipes to be located on Gillette land.
- 634 • No open or "bear" sections of highway on Gillette property.
- 635 • Gillette to retain ownership of all Gillette property above highway, including air rights, with a subsurface easement granted to the MDPW for the highway, and surface easements granted for construction.
- 636 • All tunnel sections beneath Gillette property to be designed to support building loads of 1,200 pcf.
- 637 • The effects of construction and long-term vibrations to be no greater than the effects of preconstruction vibrations at all sensitive structures, residences, and instruments. Special construction techniques to be used as necessary.
- 638 • Truck access to be maintained to all loading docks at all times during construction.
- 639 • At least three of the four gates on Dorchester Avenue to the main Gillette parking areas to be maintained open at all times during construction.
- 640 • Net temporary loss of parking to be less than 125 spaces at all times during construction.
- 641 • Special traffic control to be provided that will allow Gillette employees reasonably free entrance from and exit onto re-occupied Dorchester Avenue during shift change.

- 642 • Existing underground oil tanks and piping that are impacted by the Saseport Access Tunnel to be relocated on Gillette property in an area determined by Gillette.
- 643 • Gillette to participate in the design process for all sections of highway influencing the impacts on Gillette property and water.
- 644 • Gillette to review and agree to all plans and specifications for those portions of the work that impact Gillette during the period between now and the time that the project is completed.
- 645 • Task team for coordination with Gillette to be included in design and construction contracts.
- 646 • All mitigating measures taken to satisfy the above criteria to be carried out at no present or future cost to Gillette.

Based on analyses by our engineers and consultants and on discussions with Joint Venture personnel who prepared the D/SCES, we believe that it is feasible to modify the D/SCES to incorporate the above criteria. The proposed modifications are summarized in the following table. The modifications are incorporated in Section 3.0. Nine different routes or variations on the present D/SCES alignments were studied to determine which ones could provide mitigation of the negative impacts while requiring the least change to the present routes. Based on our study, described in Section 3.0 of this report, The Channel Preservation Design was developed. We believe that The Channel Preservation Design offers substantial positive environmental impacts on the Port Point Channel compared to the present D/SCES. The proposed modifications to the D/SCES are summarized in the following table. The Channel Preservation Design, which applies to all of the build alternatives, is summarized as follows:

- 647 • Maintain the top of the Saseport Access Tunnel below B +16 (Mean Sea Level) in Port Point Channel by 1) lowering the bottom of the tunnel section to 2 ft above the present (interior) of the Red Line, 2) maintaining the base slab thickness over the Red Line, and 3) using proven designs to minimize the base slab thickness over the Red Line tunnel.
- 648 • Maintain the top of the Northbound Central Artery essentially below the bed of Port Point Channel along the west side, using the criteria given above.
- 649 • If the new Dorchester Avenue is added, support it on attractively designed piers above the lowered Northbound Central Artery to avoid reducing width and water volume of Port Point Channel. Adjacent to Gillette property, move Dorchester Avenue westerly as far as possible but no further east than its present alignment.
- 650 • Eliminate Ramp CND to Dorchester Avenue northbound, which would require fill in Port Point Channel and take substantial property from Gillette. A ramp, if constructed, would remain on the west side of the new Dorchester Avenue.
- 651 • Perform no filling in Port Point Channel north of the new Dorchester Avenue bridge.
- 652 • Locate the point at which the proposed Northbound Central Artery separates from the present Northbound Central Artery at least 2,000 ft south of West Fourth Street and Broadway.

The engineers for the Commonwealth and our engineers have agreed that these modifications are technically feasible and do not require major changes to the D/SCES build alternative. However, we believe that while these modifications do not require major changes to the D/SCES build alternative, they would mitigate to a significant extent the permanent adverse effects on the Port Point Channel and on Gillette.

RESPONSE TO COMMENTS BY THE GILLETTE COMPANY (August 22, 1983)

Gillette has identified a number of design and construction criteria as well as administrative and legal arrangements which can reasonably mitigate the potentially adverse impacts to Gillette. These criteria are presented in Impacts to the Gillette Company - Proposed Third Harbor Tunnel 1-40/Central Artery 1-93. Response to Draft Environmental Impact Statement Report, August 1983. Complete copies of this report are on file at the Offices of the Massachusetts Department of Public Works. All concerns raised in this report are summarized in an Executive Summary included in this volume. Responses to these concerns are presented below; Items 629 through 646 present general goals while items 647 through 652 focus on design issues which would accomplish these goals.

629. The Preferred Alternative is designed such that the northbound Central Artery tunnel is almost entirely below channel bottom. The top of the Seaport Access Alignment tunnel is below the present invert of Gillette's cooling water intake.

630. There is no net loss of waterfront of Gillette property area with the Preferred Alternative.

631. Dorchester Avenue is relocated west of its present alignment adjacent to Gillette's property.

632. & 633. Relocation of Gillette water cooling system intake or discharge will be evaluated further during the design process by implementation of detailed hydraulic and thermal studies. Possible alternatives for the cooling water system are more fully described in Section 4.9.3 Preferred Alternative (re water resources) of the FEIS/FEIR. See also Section 2.5.7 Other Design Considerations regarding design of the project in the vicinity of the Gillette Company.

634. Open "boat" sections have been reduced in size and partially relocated. Final disposition of locations must be established during design.

635. It is the Commonwealth's intent that Gillette retain ownership of all existing Gillette property and air rights above the highway which would pass through the Gillette property. Specific mechanisms will be negotiated during design.

636. 1200 psf design load for the tunnel walls will be used during design.

637. As described in Section 4.8.2 Vibration of the FEIS/FEIR, it is unlikely that the levels of vibration during construction will affect Gillette's operations. No long-term adverse vibration effects are anticipated from implementation of the Preferred Alternative. Measures to mitigate vibration impacts are identified in Section 4.8.2.

638. Truck access will be maintained at all times to Gillette's loading docks.

639. At least three of four gates will be maintained open during construction.

640. Temporary parking space loss will be in the vicinity of 125 spaces during construction. Measures to reduce the temporary loss must be evaluated further during the design phase.

641. Traffic control will be provided during construction for Gillette Co. access to Dorchester Avenue.

642. Existing underground oil tanks and piping will be relocated as necessary.

643. Ongoing public involvement in the design process will include Gillette participation for all sections of highway directly affecting Gillette.

644. Gillette, through the on-going public participation process, would be expected to be involved in the review of plans and specifications for the purpose of ensuring that EIS/EIR commitments to Gillette are accomplished.

645. Coordination with Gillette, along with other affected residents, businesses and interest groups, will take place during the design process as indicated above, and will be provided for in design contracts. Provisions in the construction contracts will specify the need to coordinate activities with Gillette.

646. Costs of Gillette utility reconstruction will be borne in the project cost.

647. The top of the Preferred Alternative Seaport Access Tunnel is presently set at elevation -15.5, essentially meeting the requested criteria of -16.0.

648. The northbound Central Artery Tunnel is essentially below the bed of Port Point Channel to a point approximately 480 feet south of Summer Street.

649. The two-lane Dorchester Avenue is located over the northbound Central Artery Tunnel, spanning between the existing bulkhead to the proposed new pierhead line. The pierhead is open at each end and is provided with sufficiently large openings to avoid reduction of water volume in Port Point Channel.

650. Ramp CN-D to Dorchester Avenue has been eliminated by the redesigned South Bay interchange.

651. Filling of the Port Point Channel has been limited to the present north edge of the existing Dorchester Avenue Bridge. Fill in this area is further discussed in Section 4.9.3 Preferred Alternative (re water resources) of the FEIS/FEIR.

652. This item has not been incorporated in the Preferred Alternative as it does not appear necessary to mitigate Gillette concerns.

BOSTON WHARF CO.

INDUSTRIAL REAL ESTATE
BOSTON, MASSACHUSETTS 02110

450-4000

220 SUMMIT STREET

August 18, 1983

Mr. Robert T. Tierney, Commissioner
Department of Public Works
Commonwealth of Massachusetts
100 Nashua Street
Boston, Massachusetts

Secretary James S. Boyte
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts

Re: Third Harbor Crossing

Gentlemen:

We have reviewed the Central Artery/Third Harbor Tunnel EIS and EIR, as amended. In order to determine the impact that the Third Harbor Crossing location has on our property in the vicinity of the Fort Point Channel in South Boston. In particular, we refer to the location set forth in Alternative 5A Design Modification, as further modified by you and still further modified by plans and information submitted by the Gillette Company.

We wish to be recorded in favor of the location as described above, upon the following conditions:

1. The large scale plans reviewed at the offices of Wallace, Floyd Associates, Inc. show a ventilation opening which appears to be located near the Fort Point Channel on the boundary line of our property and that of the Gillette Company. The exact location of that opening is of critical importance to our future development plans. We request that you determine the location of the ventilation opening and that such opening will be designed and constructed so as to be located one-half on our property and one-half on that of the Gillette Company.

2. The continuation through our property of the underground tunnel from the opening referred to above has a severe impact on our future development plans for the affected parcel. In order to minimize this impact it is important that the engineering design and construction of the tunnel be such that the maximum use may be made of the property so that maximum use may be made of the surface and air rights over the tunnel.

Mr. Robert T. Tierney
Secretary James S. Boyte

-2-

August 18, 1983

3. Although we have a general understanding of the time frame within which this project is to be completed, it is important to us that the precise location and nature of the improvements be established as soon as possible and that the project be completed without undue delay.

We will appreciate being kept informed of your progress and, in particular, wish to be notified of any changes in the location of the property and in the proposed design upon which this endorsement is based.

Sincerely yours,
BOSTON WHARF CO.

By Robert T. Tierney
General Manager

Copy to:

John K. Dineen, Esq.

Gaston Snow & Ely Bartlett

Mr. Timothy J. R. Harding

Town & City Properties PLC

Mr. Bernard Strassner

Mr. James Wade

Nose Associates

Mr. Bruce Johnson

Jung-Brannen Associates, Inc.

Mr. Matthew Coogan

Undersecretary of Transportation

and Construction

RESPONSE TO COMMENTS BY BOSTON WHARF CO. (August 18, 1983)

653. The opening in the tunnel is shown to be one-half on Gillette property and one-half on Boston Wharf Co. property. The precise limits will be determined during the design phase with inputs from the affected property owners.

654. Future development of air-rights parcels has been a major consideration in the engineering and construction design of the tunnel. These issues will continue to be considered during subsequent design phase of this project; see Section 4.4.4 Joint Development.

655. All affected landowners will be included in future discussions and will be informed of specific schedule and construction information as soon as it is known. The Commonwealth is also interested in implementing the project as soon as possible.

100 RUSSELL AVENUE, WATERTOWN, MASSACHUSETTS 02172
TELEPHONE (617) 923-0739

Mr. Robert McDonagh, Chief Engineer
Massachusetts Dept. of Public Works
100 Nashua Street
Boston, MA 02114

August 1983

DAVE MR. McDONALD:

[illegible]

I have personally worked with the neighborhoods of Jeffries Point/East Leeton, South Beecan and the South End who will be directly impacted by these improvements. It is my hope that no new traffic through residential streets will be generated by these proposed improvements.

At least, we see that the depressed artery is projected to be covered with concrete slabs, and part of the roadbed will be cut back and widened to accommodate the new lanes. This will require the construction of new green medians and shoulders. The new landscape space will need an adequate, secure, seeping watercourse. This new landscape space will need an adequate, secure, seeping watercourse of funds for proper development. Landscapes over structures require irrigation and periodic plant replacement; long linear spaces are particularly difficult to supervise and police. We think these costs should be built into your plans from inception.

to be carefully submitted.

Patricia S. Lebeck ASLA

Patricia S. Loheed ASLA
President, Boston Society of Landscape Architects

Abstract

View Document

Abstract

Introduction

Trustees

Abstract

RESPONSE TO COMMENTS BY BOSTON SOCIETY OF LANDSCAPE ARCHITECTS (AUGUST 9, 1983)

MS6. The potential effects on all of the neighborhoods within the project area are carefully documented in Sections 4.4.3 Preferred Alternative (re land use impacts) and 4.16 AESMFC-WPAC's tentative design refinement has occurred in the Fort Point Channel area, as well as along the Central Artery corridor; additional design is necessary to resolve conflicts of the Preferred Alternative with the differing plans for the Charles River/North Station area of the BRA and the WDC.

657. Landscape architects are invited to take a more active role in this project through the ongoing participatory process which will be maintained throughout the subsequent design stages of this project.

558. The siting of ventilation buildings and their integration with other issues has been and will continue to be carefully studied: see Sections 4.4.4 and 4.4.5 of the ASHRAE 55-2004 Joint Development and 4.16 ASHRAE 62.1-2004. The siting of the ventilation buildings will be consistent with the Section 106 Memorandum of Agreement while meeting the air quality standards and policies of the Commonwealth.

659. The Preferred Alternative incorporates the least disruptive alignment in the Fort Point Channel area. See Sections 4.6 Aesthetic Impacts, and 5.2.3 Fort Point Channel District for a detailed description of effects, and mitigating measures in this district. Additionally, preliminary and final engineering and construction specifications will be submitted to the Massachusetts State Historic Preservation Officer (SHPO) prior to the start of construction for review and consultation with the Boston Landmarks Commission (BLC) regarding consistency with the design and development guidelines relative to historic preservation.

660. In general, traffic on residential streets will decrease in the Jeffries Point/East Boston, South Boston and South End neighborhoods as a result of this project; see Section 4.2.2 Traffic Volumes.

The design team will continue to be studied by the National Park Service as part of the project. See Section 4.4.4 for subsequent phases of the project.

AMERICAN LUNG ASSOCIATION of Boston
SERVING: Boston, Chelsea, Revere, Winthrop

"It's a Matter of Life and Death"

Ann J. Petric, President
Louis S. Cavelli, Executive Director

**STATEMENT OF THE AMERICAN LUNG ASSOCIATION OF BOSTON ON THE
PROPOSED CENTRAL ARTERY/THIRD HARBOR TUNNEL PROJECT**

August 19, 1983

The American Lung Association of Boston has reviewed the Draft Environmental Impact Statement/Report (DEIS) for the proposed Third Harbor Tunnel/Depression of the Central Artery project. Consistent with our organizational goal to reduce air pollution, our review has concentrated on the air quality impact.

Presently, transportation generated pollutants are the most serious air pollution problem in the Boston region. Gases (derived from nonmethane hydrocarbons (NMHC) and carbon monoxide (CO)) are recorded at substantial levels.

Improving air quality must continue to be an important criteria in the evaluation of proposed transportation projects. The DEIS seems to indicate that there will be some positive impacts on air quality, but many negative as well. If other criteria are to make the project acceptable, there must be much more attention to measures to mitigate the negative air quality impacts.

The DEIS mentions that, because of the federal motor vehicle control program (FMVCP), air quality will improve over present (1982) levels. These improvements will occur despite this project and therefore should be discounted. These gains must be used to actually improve air quality, not just to offset pollution increases from other factors. Boston must not become another Phoenix, Arizona where air pollution levels have remained static, and even become worse, because increased traffic volume has offset the gains from the FMVCP and from an inspection/maintenance program.

In all alternatives, except I6, NMHC, CO, and nitrogen oxides (NOX) emissions will increase over the no-build alternative. Increased traffic volume will cause more pollution than any reductions possible from less congestion and less circuitous driving patterns. However, the DEIS reports on page 111 in the traffic volume section that vehicle miles traveled (VMT) will decrease for all alternatives because traffic will not be tempted to go longer distances to avoid a central artery bottleneck. Yet, this VMT reduction is not reflected in the air quality analysis. Why is there this discrepancy between the two parts of the DEIS?

The DEIS mentions that the increases in NMHC must be offset with improvements elsewhere in the Massachusetts Improvement Program, because Massachusetts is currently a non-attainment area for NMHC. The final EIR should be more specific as to how these offsets will be achieved. How? What quantities? What programs? At what costs? Not replacing the lost parking lots would be a start.

CHIEF ENGINEER
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STATEMENT OF AMERICAN LUNG ASSOCIATION OF BOSTON

Page 2.

Increased traffic volume will also lead to increased CO emissions, however, less congestion should improve the ambient levels. The final report should be more specific as to the ventilation stack designs which could minimize the CO impacts. The report should indicate present and probable future "hot spot" areas (CO is a very localized pollutant) and indicate whether the ventilation stacks can be put elsewhere. Is it really possible to place ventilation stacks to avoid hot spots?

The final report should detail the maintenance necessary (and its predicted costs) to ensure that the ventilation system in the depressed artery and the harbor tunnel works properly. Also, what is involved in cleaning the vents; what pollutants are released, especially particulates; what are the costs; and other such impacts?

There must be constant real-time monitoring of CO in the tunnels and at other locations. If CO vents, CO accumulation can lead to delayed driver reaction time and lead to accidents.

Insufficient consideration is given in the DEIS to the impact of construction and long term traffic on particulate levels and on other diesel components. The report access segment should help to keep the diesel trucks out of South Boston. This is to be supported, however, what will be the overall impact of the increased construction truck traffic?

Although the report gives the project no credit for contributing to the growth of Logan Airport — the project will enhance Logan's growth. No consideration is given to the increased airplane emissions. Also, there is no mention of how the increased number of cars arriving at Logan is to be handled. Should new hot spots be expected there? What mitigating measures could be taken?

Finally, greater consideration of mass transit alternatives and components within this project is needed. Non-use of private cars results in the greatest air quality improvement. The report does not consider some of the adverse impacts mentioned above being mitigated by using a new harbor tunnel. For example, a new tunnel would be built and Logan? Other transit improvements, a blue line spur into the airport, express buses from outlying areas to the airport, a red line/blue line connector, for example, should be indicated as possible projects which could yield the needed offsets. This could possibly improve the chances for future funding of these projects.

The American Lung Association of Boston hopes that the cumulative impacts on our air quality of a project of this magnitude will not be understated. It is a matter of our life and death.

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RESPONSE TO COMMENTS BY AMERICAN LUNG ASSOCIATION OF BOSTON (August 19, 1983)

662. As a result of this comment and further analysis of the proposed project, the Commonwealth reexamined the user benefits of all alternatives evaluated. An error in the method of calculation was discovered and the new numbers for all alternatives are presented in the SUMMARY of the FEIS/FEIR. In all build alternatives, annual VMT will be increased over No-Build conditions due to the additional vehicle trips attracted by the build alternatives. The FEIS/FEIR has been revised to reflect this finding. The air quality analysis is consistent with this recent finding; it should be noted the network used to assess air quality impacts is much smaller (essentially only the directly affected roadways). This smaller network will carry more vehicles than with the No-Build Alternative because drivers will no longer divert to side streets or drive out of their way to avoid congested facilities. However, with the Preferred Alternative, NMHC and CO will be reduced relative to the No-Build Alternative in the year 2010 because of the significantly improved highway facilities. NO_x emissions, which increase as speeds increase, will be increased slightly (by about 10 percent) as compared to the No-Build Alternative in 2010 (see 4.7 AIR QUALITY).
663. The Preferred Alternative is expected to result in reductions of NMHC in 2010; see Section 4.7.1 Mesoscale Analysis. No mitigating measures will be necessary for NMHC.
664. Design of mitigating measures for ventilation building impacts on very localized areas will occur as part of the preliminary design phase. See Section 4.7.5. As indicated in Section 4.7.5, the effects of the ventilation building emissions on CO levels will be insignificant.
665. Details of maintenance will be based on tunnel ventilation design. Standard procedures for maintenance will be followed.
666. Real-time monitoring of CO in the proposed tunnels will be provided, as indicated in Section 4.7.4 Concentrations in the Tunnels.
667. Impacts of construction on air quality are addressed qualitatively in Section 4.7.6. The scoping determinations from the Executive Office of Environmental Affairs, with input from both the Commonwealth's air quality staff at DEQ and also from EPA, did not require long-term analysis of suspended particulates from the highway project. Measures to mitigate construction period dust impacts will be incorporated into the construction specifications.
668. Airport growth will occur with or without the project (see Section 1.3), and air quality at Logan Airport will improve with construction of the Preferred Alternative. Land use impacts at Logan are discussed in Section 4.4.3 (re land use). Increased airport activity, and the environmental consequences of that activity, are beyond the scope of this project.
669. Previous studies have concluded that public transit improvements alone cannot solve the cross-harbor vehicle capacity problem. The Commonwealth is committed to continuing to explore public transit improvements. For example, direct ramps from the South Station Transportation Center to the new Third Harbor Tunnel will provide direct transit service between South Station and Logan as a result of the project. See Section 1.3 and Section 4.2.8 of the FEIS/FEIR. A study of the effects of extending Blue Line service directly to the airline terminals, of increasing cross harbor ferry services, and of increasing use of private limousines to the Airport was also evaluated in the DEIS/DEIR (Section 4.2.9 Consequences of Other Transportation Improvements).

ALEPPO SHRINE YACHT CLUB

COMMODORE HARVEY MILLER 337-3136
VICE COMMODORE RICHARD CLEMENT 867-1178
TREASURER EDWIN SHAW 337-4643
FLYING CAPTAIN JERRY MAGUIRE 337-3000
PILOT CAPTAIN DANA FREEMAN 337-3776



DIRECTORS:
BERTIL JOHNSON 337-1033
ELLERSON 644-5886
JAMES 337-1033
NORMAN HOLCOMB 337-4010
SECRETARY BOB A. DAVIS 444-0446

MAILING ADDRESS:
63 Highland Ave.
Norton Center, MA. 02130

August 19, 1983

Massachusetts Department of Public Works
1700 Washington Street
Boston, MA. 02114

Attn: Mr. Robert McNamee
Chief Engineer

Re: Third Harbor Tunnel/Widened And Deepened Central Artery

Dear Mr. McNamee,

We, of the Aleppo Shrine Yacht Club, are not opposed to the building of a third Tunnel, in fact we are in favor of it.

We are opposed, however to any further destruction of navigable waterways or water areas in Boston Harbor.

The Massachusetts coast line is one of the greatest assets that the State has, and Boston Harbor is one of the finest and most interesting harbors in the country.

Yet, Boating people from other areas do not come into Boston Harbor because there is no public landing place close enough to the hub for them to walk into the city.

We have wonderful tourist attractions in Quincy Market, and our historical land marks, but our harbor has been wasted by buildings that shut off the use of the harbor to the public.

Other major cities, such as Newport and Annapolis, have taken advantage of their harbors and attracted large throngs of tourists and boaters to the waterfront and hundreds of thousands of dollars to their merchants, which eventually ends up in the city itself.

Very truly yours,

Harvey S. Miller

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The small City of Salem has its Pickering Wharf, and Gloucester and Cohasset have harborside restaurants where boats can tie up alongside.

Boston does not have any place in the down town area open to transient boaters.

The Fort Point Channel Area is a natural spot for a Public Landing for discharging passengers, and the channel and accompanying areas could hold over a thousand boats.

Then we have water events, such as the Tall Ships, who are returning in 1984, the Annual US Constitution turn around on July 4, the fireworks in the harbor, the boat races and parades, etc., we have large boating participation but as soon as the events are over the boats have to leave the area, without spending any money in Boston, because they have no place to land.

My understanding is that the proposition of a third tunnel in the Fort Point Channel area is to be accompanied by a surface roadway.

The surface roadway is very objectionable as it would spoil the use of the Fort Point Channel as a natural boating recreational area.

The International Shrimpers Yachting Association is coming to Boston in July of 1984 at the same time that the Shrimpers International Conference will bring in 20,000 members.

Our local Aleppo Shrine Yacht Club has been asked to help host this event.

We are at a loss as to how we can accommodate an event of this type since we only have two moorings in the Fort Point Channel Area with no place to land to pick up passengers.

Please reconsider the Tunnel/Artery Impact before destroying one of our greatest assets and tourist attractions.

Very truly yours,

Harvey S. Miller

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RESPONSE TO COMMENTS BY THE ALEPPO SHRINE YACHT CLUB (August 19, 1983)

670. The Preferred Alternative represents the least disruptive alignment in the Fort Point Channel area. This alignment does not preclude the development of marina activities in the Fort Point Channel and Boston Harbor areas. In the Fort Point Channel area, pedestrian improvements will make it easier for people to gain access to the water's edge; see 4.3.3 Preferred Alternative (re land use impacts).

August 22, 1983

316 Summit Ave. #3
Brighton, Mass. 02135

Robert J. McDermott, Chief Engineer
Massachusetts Department of Public Works
100 Bechua Street
Boston, Mass. 02114

SUBJECT: COMMENT ON THE DRAFT SUPPLEMENTARY HARBOR TUNNEL/
DEEPENED CENTRAL ARTERY ENVIRONMENTAL IMPACT STATEMENT
JULY 1983.

Dear Mr. McDonough:

I am commenting as below in behalf of myself. Previously, I mailed a comment to you as a member of the Environment & Safety Committee of the Ad Hoc Committee for a Safe Boston Harbor. This comment does not reflect their views.

COMMENT ONE

Alternative 6 would be far less expensive and is thus preferred to Alternative 5A. The DEIR does not adequately assess the albeit confusing and enormous economic impact of improving Boston transportation by the proposed tunnel. Nowhere do I see an attempt to assess just how many more private autos will be brought to the city which otherwise would be left at home, due to the fact a third harbour tunnel exists. This is based on the idea that today many private autos are left home because they are inconvenient in the city. But this is not true. The DEIR does not assess the economic impact of the fact that transportation is not improved but simply more is provided. But, peculiarly, there are peaks and valleys in this. Fridays become more congested than ever by the "improvement". Other days will, at least for a while be improved. But, the ultimate effect of improving transportation for the private auto is always eventual further destruction of the urban environment. If its radical transportation program is not adopted, the DEIR report should show what the effect of having more persons think they can now easily drive their car into Boston and park it. And that 50% is on the urban environment. Houston, Texas is an instructive example of a city where congestion occurs in few places and driving speeds are terrible. Yet, the same urban roads were required for parking, working and other impacts if imported to Boston in operation would

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radically alter it. We cannot have Boston and an automobile convenient area in the same place. Thus, the DEIR's belief as tunnel is inimical to the city's nature. I believe as I have pointed out above, one way in which the DEIR fails or indicates it is unaware of this is to not deal with the domino effect of that improvement in transportation and its effects. And, one of these effects, and it the tunnel effect, too, is that the tunnel spawns automobile activity which reduces the "improvement" it provides.

COMMENT TWO

On Page 27, it seems overly optimistic to state that since sediments dredged 500 ft. of modified Alternative 5a alignment are suitable for ocean disposal, those from the Alternative 5a alignment will be also. Studies of conditions of the harbor sediment have shown enormous differences, particularly near shore.

Thank you for the opportunity to comment. I regretted not being present at the August 8 and 9 hearings in Boston.

Sincerely

John F. Doherty, Jr.
John F. Doherty, J. D.

RESPONSE TO COMMENTS BY JOHN F. DOHERTY, J.D. (August 22, 1983)

671. See Section 2.4 REASONS FOR NOT SELECTING OTHER EIS ALTERNATIVES for an explanation of why the Preferred Alternative was selected over Alternative 6, and Sections 1.3 and 4.2 for discussions of induced traffic from the Preferred Alternative. The project will answer the traffic needs of existing and projected (with or without the project) motorists while actually reducing the intrusiveness of highways in the City of Boston.

672. Section 3.7 WATER RESOURCES discusses the physical and chemical characteristics of bottom sediment within the project area and were determined through an evaluation of existing data as well as site-specific investigation. See also Section 4.13 DREDGED AND EXCAVATED MATERIAL DISPOSAL for a discussion on disposal of dredged material. The reference in the SDEIS/DEIR to similarities between the sediments of the Alternative 5A and Alternative 5A Modified alignments across the harbor were based on elutriate analyses of actual samples. As indicated in Section 4.13, however, additional sediment testing will be necessary before ocean disposal of the sediments are approved.

COMMENTS OF CONSERVATION LAW FOUNDATION OF NEW ENGLAND
ON THE DRAFT SUPPLEMENT TO THE DRAFT ENVIRONMENTAL IMPACT
STATEMENT/REPORT FOR THE THIRD HARBOR TUNNEL
AND CENTRAL ARTERY

The Conservation Law Foundation of New England ("CLF") is pleased to submit its comments on the Supplement to the Draft Environmental Impact Statement/Report ("DEIS") for the Third Harbor Tunnel and Central Artery. CLF acknowledges the need to reduce traffic congestion through downtown Boston and on routes to and from Logan Airport. We support efforts to address these issues now rather than later. We are concerned, however, that the DEIS fails to examine a crucial component of any long range transportation scheme in the Boston area: mass transportation. We believe that public transportation can and must play an essential role in any construction project of this size and environmental impact. CLF's comments will focus solely on this important issue.

The summary DEIS itself states that:

The Boston Transportation Planning Review concluded in 1972 that the provision of high quality public transportation in the core area should be primarily by public transportation, with selected improvements to the regional highway network to help solve critical transportation problems in Boston's core area.

Summary DEIS at i-ii.

The summary DEIS also notes that "over the past decade,

policy initiatives have largely carried out the ambitious public transportation construction program defined in the early 1970's." Summary DEIS at ii. While CLF applauds the implementation of these initiatives, it does not believe they eliminate the need for the thoughtful integration of a mass transit plan into the construction alternatives proposed in the DEIS. Indeed, the very purpose of the construction proposed by the DEIS is to increase accessibility to the city by decreasing congestion. Improved ingress and egress will naturally induce increased usage of private vehicles and, in the absence of a comprehensive mass transit plan for the project, will likely have the effect of discouraging use of existing public transportation.

Moreover, it is, in our opinion, imperative these mass transit issues be addressed in the process of developing the central artery and harbor tunnel alternatives and in selecting a preferred course of action. To be most effective, efforts to increase use of public transit must be an integral part of the DEIS. The draft document does not discuss present or future mass transit options. Most importantly, it does not include an analysis of improvements to mass transportation which could reduce congestion in these areas. CLF believes this is an important omission in the DEIS. In our view, public transportation is clearly a viable alternative or supplement to highway construction and should be included in the DEIS.

We suggest the following two examples as the types of

discussion which we feel would be appropriate for a thorough PEIS.

1. The Logan Airport "x" service, although efficient, is presently under-utilized in part because of the cumbersome bus switch at the edge of the Airport and the absence of portal to portal express service. Consideration should be given in the PEIS to changes in Blue Line service which might make its use more attractive. Consideration should also be given to including a mass transit component in the proposed tunnel construction to help alleviate the heavier traffic loads encouraged by improved access. For instance, two lanes of a four-lane third harbor tunnel might be reserved for mass transit. This alternative would provide an efficient shuttle bus, or train, from South Station to Logan. This is merely one of the options for decreasing automobile traffic to and from Logan.

2. Possibilities for increasing usage of mass transit from the north and south shores should be carefully studied. Satellite parking programs have been used with great success by many cities. The central artery and third harbor tunnel projects would provide a rare opportunity to incorporate a park-and-ride network with commuter shuttle service.

Depression and expansion of the central artery is an ambitious and worthy project for the Boston area. However, the PEIS should acknowledge that expanded, improved access will most certainly attract additional traffic flow. This will not only

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affect the routes in question, but will also raise additional issues. Increased commuting by car will further intensify Boston's present downtown congestion and parking shortages. (The depressed central artery will also eliminate substantial parking space.) Mass transportation will alleviate rather than add to these problems.

In our view, mass transportation is an integral part of the solution to Boston traffic congestion. It is also a method which strikes at the root of the issue: reducing traffic flow. Highway construction and expansion, unfortunately, do the opposite, and therefore run the risk of being self-defeating. CLF believes a forward looking traffic plan for the Boston area must rely substantially on mass transportation. CLF respectfully recommends that the PEIS include a comprehensive analysis of mass transportation options for the central artery and Logan Airport area.

Thank you for this opportunity to comment.

Sincerely,
Emily M. Bateson
Emily M. Bateson
Program Director

August 22, 1983

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RESPONSE TO COMMENTS BY THE CONSERVATION LAW FOUNDATION (August 22, 1983)

673. While stating that access to the area should be primarily by public transit, the BPR did include recommendations for a third harbor crossing to Logan Airport; the need for capacity improvements to the Central Artery was also recognized at that time. Section 4.2.9 of the DEIS/DEIR (December 1982), considered the consequences on traffic conditions of several public transit options, including improvements to Blue Line Service; improvements to Suburban Bus and Limousine service; and provisions of Cross-Harbor Ferry service. These options were evaluated for their effect in improving access to Logan Airport, and were compared to both the No-build and Build alternatives. Results of the analysis concurred with the Prior Corridor Planning Study findings that these types of mass transit improvements could supplement, but not be substituted for, the necessary highway improvements. As a result of many comments received during the recent informational meetings and public hearings, exclusive bus ramps linking the South Station Transportation Center with Logan Airport via the Third Harbor Tunnel, and also with the Southeast Expressway, are now included in the Preferred Alternative. See Section 1.3 and Section 2.3.5 Pre-DEIS Studies in the FEIS/FEIR.

674. Section 1.3 of the FEIS/FEIR discusses the important issue of the project's relationship to transit policy and the inclusion of public transit improvements within the Preferred Alternative. As a result of many comments received during the recent informational meetings and public hearings, exclusive bus ramps linking the South Station Transportation Center with Logan Airport via the Third Harbor Tunnel, and also with the Southeast Expressway, are now included in the Preferred Alternative. Also documented in the FEIS/FEIR, transit improvements alone cannot solve the need for additional cross-harbor capacity.

675. See response to comment number 673. Train service from South Station to Logan is not feasible because of the steep grades (profile) necessary. However, with the South Station bus ramps of the Preferred Alternative, direct bus service from South Station to Logan will be offered, representing a significant improvement in public transit to Logan. Improvements in Blue Line service to Logan would have very limited impact on total trips to Logan by autos; see Section 1.3 and Section 4.2.

Transit improvement options serving North Shore areas have been extensively evaluated by the MBTA in its Draft Environmental Impact Statement & Alternatives Analysis for the North Shore Transit Improvements Project (May 1979) UMTA-NA-19-9001. That document evaluated a number of options, including Blue Line extensions to the Airport; commuter rail improvements; and others. The Commonwealth and Massport are currently working on the development of satellite passenger check-in stations to reduce traffic to Logan.

The MBTA is also currently implementing major transit system extensions in the Southwest Corridor (Orange Line) and Northwest Corridor (Red Line), making major improvements to its existing facilities; is also preparing designs for a number of park-ride facilities. These transit system improvements, combined with the major improvements at South Station and the Preferred Alternative bus ramps, will improve not only transit access to the Airport but will provide the opportunity for improved express bus service for commuters to and from Boston and the Airport.

676. Sections 1.3 and 4.2 of the FEIS/FEIR describe fully the evaluation of "induced traffic", or the attraction of additional traffic, as a result of the project. Review of the nature of increased traffic on the Central Artery as a result of the project suggests that approximately one percent of vehicle trips were generated as a result of diversion from transit, and that less than one percent are diverted trips from Route 128. The majority of "induced" trips are expected to come from diversion from local streets and arterials in the immediate core area. The project will not substantially reduce the availability of parking in downtown, since lots displaced under the Artery will be replaced prior to their becoming unavailable by construction activities; see Sections 4.2.9 and 4.4.3.

677. The FEIS/FEIR incorporates the exclusive bus ramps mentioned previously as part of the overall highway improvement project, and reviews prior studies on transit, the effect of forthcoming transit improvements, and transit as an alternative and supplement to the Central Artery/Third Harbor Tunnel project. See Section 1.3 of the INTRODUCTION to the FEIS/FEIR which further describes and evaluates the relationship between highway facilities and mass transit as they relate to this project. As discussed in this section, the Commonwealth is committed to improving mass transit independently of the project, but also believes the Preferred Alternative reflects a major commitment to the Commonwealth policy of making public transportation work in the Boston region.

SUPPLEMENT TO ORAL TESTIMONY

PRESENTED
AUGUST 9, 1983
MICHAEL J. HALL
QUINCY MARKET PLACE

ESTIMATED IMPACT OF THIRD TUNNEL UPON THE
ORIENT HEIGHTS COMMUNITY, EAST BOSTON

With the current proposals for the construction of the Third Harbor Tunnel now under scrutiny, a viewpoint shared by state transportation policy makers and residents of several adjoining neighborhoods within East Boston has begun to surface. These groups independently concluded that Orient Heights will be the area of East Boston least disrupted by the presence of a new tunnel and therefore should be a tacit participant in the ongoing tunnel discussion. It is possible that this claim has some basis, yet to embrace it prematurely without a thorough examination of the proposed tunnel's effects upon Orient Heights would be detrimental.

It can not be denied that the proximity between the tunnel's designated site and the Orient Heights community is ample enough to constitute the appearance of an "impact free" zone. This misconception is further bolstered by the conclusive absence of any plan to physically alter the area through home removal or street realignment. This testimony will attempt to focus upon the subtler, though no less harmful effects of a third tunnel upon the residential Orient Heights area and call for efforts to mitigate them.

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From a neighborhood vantage point the third harbor crossing consists of much more than a means by which to relieve the city's choked central artery and existing tunnels of automobile congestion.

Rather, it more accurately represents an extension of Logan Airport and as an "airport access road" is designed to increase:

(1) the operational flight capacity of the airfield through increased passenger flow, and (2) increase the vehicular traffic in the form of passenger automobiles and a host of airport related service industries, most notably freight forwarding, shipping, and trucking firms and parking, shuttling, and rent-a-car facilities.

It is this vital, causal relationship between the third tunnel and airport related expansion which forms the major premise for the following discussion of two key areas: (A) aircraft noise/pollution levels; (b) vehicular congestion/pollution levels.

A. Aircraft Noise/Pollution Levels

The Orient Heights area, (esp. in the one-quarter mile square between Barnes Avenue and the Winthrop Bridge) is the only sector of the entire City of Boston subject to parallel operations,

(arrivals on 22L and 22R, departures on 4L and 4R) which occur simultaneously on a daily basis. Because of such a flight arrangement this area feels the impact of a greater number and a greater diversity of jet craft operations. Noise levels within this wedge pocket have been classified as unhealthy, in combination with low flying aircraft and the pollutants emitted from jet exhaust systems. Thus, we:

- Call on the Massachusetts Port Authority to readress its commitment to soundproof those impacted residences to help alleviate the intolerable noise levels.
- Call on the Massachusetts Port Authority to modify its existing Preferential Runway Advisory System (PRAS) to more evenly and effectively disperse the noise throughout the city.

B. Vehicular Congestion/Pollution Levels

The current level of automobile overcrowding within the Orient Heights area (Route 1A, McClellan Highway) seriously calls into question the preservation of physical health, safety and environmental resources. This has been further intensified within the last two years by an influx of airport related service businesses spilling onto our neighborhood streets, adjoining our parks and recreation centers and repossessing our small parcels of undeveloped land which had formerly served as essential plots of breathing space in the community. Thus, we:

- Call on the City of Boston to impose a freeze on the number of automobiles to be parked in East Boston.
- Call on the City of Boston to adopt text application No. 223 Amendment No. 96 which would deem lots other than those ancillary to businesses within East Boston, (excluding Logan Airport) as "forbidden uses"; thus rezoning to restrict parking operations only to those meeting the criteria.

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Call on the City of Boston to give serious consideration to a widening of Route 1A in East Boston (McClellan Highway) and Bell Circle in Revere to handle increased traffic and queues from Logan Airport expansion.

- Call on MassPort to channel airport service related industries back onto airport property.
- Restore parcels of land formerly parking facilities into beneficial uses for East Boston residents.
- Call on the State to conduct an EPA study of air quality within Orient Heights, (along McClellan Highway/Route 1A) to determine if unhealthy pollution levels warrant immediate action.

---COMCLUSION---

In the proceedings concerning the third tunnel, East Boston residents have been made integral components of the political process as never before. I am hopeful that their concessions to preserve the viability of our neighborhoods, quality of life, property values, and environmental safety are granted, in our efforts to ensure that progress is a meaningful and harmonious venture for all concerned.

Sincerely,

Paul R. Ferris

Paul R. Ferris
11 Bearden St.
E. Boston, MA 02128

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RESPONSE TO COMMENTS BY MARK R. FERRI, EAST BOSTON (August 9, 1983)

678. The FEIS/FEIR concludes that improved auto access does not cause airport growth. Provision of improved access directly to the Airport will reduce airport impacts on the community of East Boston by reducing traffic on local streets and improving air quality.

679. Modifications to Massport's operational procedures at Logan Airport are outside the scope of this project, but the Commonwealth will work with Massport on this issue.

680. The Preferred Alternative will result in improved air quality and reduced traffic on residential streets in East Boston; see Section 4.5.3 Preferred Alternative (re neighborhood community facilities) and Section 4.2.2 Traffic Volumes. The specific measures outlined in this letter, such as requests of the city to impose a freeze on the number of automobiles parked in East Boston, are outside the scope of this project. However, as part of the Commonwealth's commitment to mitigating adverse airport-related impacts on adjacent neighborhoods, a land use/zoning study will be undertaken to review the effects of increased airport activity on land uses in the area and to develop controls on airport-related development at off-airport locations.

STATEMENT IN SUPPORT

of the
Third Tunnel Under Boston Harbor
and
Depression of the Central Artery
by
Associated General Contractors of Massachusetts, Inc.

The Associated General Contractors of Massachusetts, Inc. supports and endorses the proposed Third Tunnel Under Boston Harbor and the proposed Central Artery. The proposed Third Tunnel and Central Artery will maintain and enhance the economic vitality of Massachusetts and the quality of life of its capital city.

Over the next ten years the Central Artery has to be totally rebuilt or torn down. Depressing the Central Artery and making it an eight lane highway would solve the major traffic problem of the region. It would remove a major barrier between Boston and its port facilities.

Logan Airport is a major element in the continued strength of Boston as a center of commerce, tourism and government, and traffic to and from Logan Airport would be better handled through a Third Tunnel.

Presented at the Public Hearing
Faneuil Hall
August 3-9, 1983



AGC OF MASSACHUSETTS - 800 WORCESTER STREET WELLESLEY, MASS 02151 - 617 235-1000

RESPONSE TO COMMENTS BY ASSOCIATED GENERAL CONTRACTORS OF MASSACHUSETTS
(AUGUST 8-9, 1983)

No response necessary.



Metropolitan Area Planning Council

110 Tremont Street Boston, Massachusetts 02108 (617) 451-2770

Serving 101 Cities & Towns in Metropolitan Boston

STATEMENT OF ELIZABETH A. BRANSFELD, PRESIDENT
PRESIDENT OF THE METROPOLITAN AREA PLANNING COUNCIL
THIRD HARBOR TUNNEL PUBLIC HEARING
FANEUIL HALL, TUESDAY, AUGUST 9, 1985

MY NAME IS ELIZABETH BRANSFELD AND I AM THE PRESIDENT OF THE METROPOLITAN AREA PLANNING COUNCIL. THE MAPC IS THE OFFICIAL REGIONAL PLANNING AGENCY FOR THE 101 CITIES AND TOWNS IN THE BOSTON METROPOLITAN AREA. THE AGENCY CONDUCTS ECONOMIC DEVELOPMENT, ENVIRONMENTAL, LAND USE, AND TRANSPORTATION PLANNING FOR THE REGION AND ITS MEMBER COMMUNITIES. BY STATE REGULATION, MAPC REVIEWS ALL ENVIRONMENTAL IMPACT ANALYSES FOR PROJECTS IN THE BOSTON METROPOLITAN AREA.

OUR AGENCY HAS PARTICIPATED IN THE REVIEW AND ANALYSIS OF THE THIRD HARBOR TUNNEL AND CENTRAL ARTERY PROJECTS SINCE THEY WERE FIRST CONSIDERED AS CORRIDOR PLANNING STUDIES. WE PARTICIPATED IN THE INTER-AGENCY MEETINGS AND HAVE CONDUCTED EXHAUSTIVE REVIEWS OF THE VARIETY OF TECHNICAL DOCUMENTS PRODUCED AS PART OF THE PROJECT.

THERE IS NO QUESTION THAT THE CONSTRUCTION OF A THIRD TUNNEL AND THE DEPRESSION OF THE CENTRAL ARTERY WILL SERVE AN IMPORTANT NEED AND IMPROVE TRAFFIC IN THE CORE AREA.

William A. Gorman, Jr. President

William C. Sargent Vice President

Frank E. Butler Secretary

Barbara A. Bush Treasurer

Executive Director: Alexander J. Zelenko

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HOWEVER, IN ADDITION TO THE TRAFFIC BENEFITS, IT IS IMPORTANT THAT CONSIDERATION BE GIVEN ALL THE OTHER IMPACTS THAT MAY DEVELOP DURING THE CONSTRUCTION PROCESS, THE IMPACTS THAT THE PROJECTS WILL HAVE ON BOSTON NEIGHBORHOODS IN THE FUTURE, THE OVERALL ENVIRONMENTAL IMPACT OF THE FACILITIES, AND THE IMPACT THAT THE NEW FACILITY WILL HAVE ON THE CITY'S AND THE REGION'S FUTURE DEVELOPMENT AND ECONOMIC GROWTH.

THE THIRD TUNNEL AND CENTRAL ARTERY PROJECTS ARE BEING CONSIDERED AT A TIME WHEN MANY OTHER TRANSPORTATION IMPROVEMENTS ARE BEING RECOMMENDED, SUCH AS IMPROVEMENTS TO NORTH AND SOUTH STATIONS, GREEN LINE IMPROVEMENTS TO CAMBRIDGE, DEVELOPMENT IN SOUTH BOSTON AND MAJOR HIGHWAY IMPROVEMENTS IN CHARLESTOWN, TO MENTION A FEW. IT IS, THEREFORE, ESSENTIAL THAT THESE PROJECTS BE CONSIDERED NOT ONLY ON THEIR OWN MERITS, BUT IN THE CONTEXT OF AN OVERALL TRANSPORTATION SYSTEM FOR THE METROPOLITAN BOSTON AREA.

IN AN EVEN BROADER CONTEXT, THE TRANSPORTATION SYSTEM MUST STRENGTHEN, HELP REVITALIZE, AND ENHANCE THE AMENITIES AND THE QUALITY OF LIFE IN THE METROPOLITAN AREA.

THESE OVERALL BENEFITS MAY SIGNIFICANTLY OUTWEIGH THE LOCALIZED IMPACTS OF CENTRAL ARTERY AND HARBOR CROSSING, WHETHER BENEFICIAL OR ADVERSE. IT IS THE ROLE OF THE METROPOLITAN AREA PLANNING COUNCIL TO LOOK AT THE CENTRAL ARTERY-HARBOR TUNNEL PROJECTS IN THIS BROADER OVERALL CONTEXT AND TO CONSIDER HOW THE AREA WILL BE SERVED BEST WITHIN THE LIMITS OF REALISTICALLY AVAILABLE FUNDING AND THE PURPOSES FOR WHICH THE FUNDING MAY BE USED.

THE COUNCIL, REPRESENTING LOCAL ELECTED OFFICIALS IN THE COMPREHENSIVE PLANNING PROCESS, HAS ESTABLISHED A SPECIAL THIRD HARBOR TUNNEL/ CENTRAL ARTERY TASK FORCE TO CONDUCT A DETAILED REVIEW OF THE TECHNICAL DOCUMENTS AND OF THE EXPECTED EFFECTS ON THE REGION.

THE POSITION OF THE COUNCIL AND ITS RECOMMENDATIONS TO THE GOVERNOR WILL BE MADE ON AUGUST 22, AND MAY INCLUDE THE CHOICE OF THE BEST ALTERNATIVE FOR THE REGION AND RECOMMENDATIONS FOR MODIFICATIONS OR CONDITIONS TO MAXIMIZE BENEFITS TO THE BOSTON METROPOLITAN AREA AND ITS RESIDENTS.

CITIZENS AND LOCAL OFFICIALS ARE INVITED TO EXPRESS THEIR CONCERNS TO MAPC BY AUGUST 17 IN ORDER TO ENSURE THEIR CONSIDERATION BY THE AUGUST 22 DEADLINE.

Testimony
of
Massachusetts Business Roundtable, Inc.

Proposed Central Artery and
Proposed Third Harbor Tunnel

Tuesday, August 9, 1983
Faneuil Hall
Boston, Massachusetts

by
John D. Crosier
Executive Director

MY NAME IS JOHN D. CROSIER AND I AM THE EXECUTIVE DIRECTOR OF THE MASSACHUSETTS BUSINESS ROUNDTABLE, INC., A STATEWIDE ORGANIZATION OF THE LARGEST PRIVATE SECTOR EMPLOYERS WITH APPROXIMATELY 160,000 EMPLOYEES. OUR PURPOSE IS TO WORK FOR A STRONG, COMPETITIVE ECONOMIC CLIMATE FOR MASSACHUSETTS BUSINESS SO THAT WE CAN GAIN MORE JOBS HERE.

THE MASSACHUSETTS TRANSPORTATION SYSTEM, AND IN PARTICULAR THE PROPOSALS UNDER CONSIDERATION TODAY, ARE OF VITAL CONCERN TO ANY SOUND ECONOMIC POLICY. ACCESS TO LOGAN AIRPORT AND THE PORT OF BOSTON ARE OF OBVIOUS INTEREST TO ALL MASSACHUSETTS BUSINESSES.

MASSPORT REMAINS A KEY ELEMENT IN PROVIDING EFFECTIVE AIR AND WATER TRANSPORTATION FOR PEOPLE AND FREIGHT. SIXTEEN PERCENT OF MASSACHUSETTS JOBS IS DIRECTLY RELATED TO EXPORTS AND MUCH OF THOSE ARE SHIPPED FROM LOGAN AIRPORT OR THE PORT OF BOSTON.

BECAUSE OF OUR DIVERSE ECONOMIC BASE, THE MASSACHUSETTS ECONOMY IS UNIQUELY POSITIONED TO WITNESS STRONG JOB GROWTH. HOWEVER, THAT GROWTH DEPENDS ON SUBSTANTIALLY IMPROVED ACCESS TO LOGAN AIRPORT WHICH IS CRITICAL TO THE TYPES OF EMPLOYEES THAT OUR ECONOMY CAN ATTRACT AND THE TYPES OF GOODS WE NEED TO MOVE THROUGH THAT INTERNATIONAL AIRPORT.

WITH AUTOMOBILE TRAFFIC AT A VIRTUAL STANDSTILL DURING COMMUTER HOURS AND WITH BUSINESSES RELYING ON TRUCKING FOR SHIPMENT OF DELIVERIES CONTINUALLY THWARTED BY ERRATIC SCHEDULES BROUGHT ABOUT BY TRAFFIC CONGESTION, A STATUS QÜO DECISION TO DO NOTHING IS CLEARLY NOT AN ALTERNATIVE.

AS WE LOOK FORWARD TO INCREASED OPPORTUNITIES TO BETTER COMPETE IN NATIONAL AND INTERNATIONAL MARKETS, IMPROVED ACCESS TO LOGAN AND THE MOVEMENT OF TRAFFIC THROUGH OUR CAPITAL CITY MUST BE ADDRESSED NOW. WE APPLAUD THE VERY VIGOROUS EFFORTS OF THE ADMINISTRATION TO FORCE A CONSENSUS RESOLUTION OF THE MANY PROBLEMS SURROUNDING THESE DIFFICULT CHOICES. WE BELIEVE THAT BOTH A THIRD HARBOR TUNNEL AND A SOLUTION TO THE CENTRAL ARTERY PROBLEM ARE REQUIRED NOW.

THE MASSACHUSETTS BUSINESS ROUNDTABLE DOES NOT HAVE THE TECHNICAL RESOURCES TO COMMENT ON THE SPECIFICS OF THE VARIOUS ALTERNATIVES BUT WE DO KNOW THAT IF A RESOLUTION IS NOT REACHED VERY SOON THEN ALL OF US WILL FEEL THE NEGATIVE IMPACT.

THE MASSACHUSETTS BUSINESS ROUNDTABLE'S FRAMEWORK INCLUDES A CHAMBER OF COMMERCE NETWORK WHICH OBVIOUSLY INCLUDES THE GREATER BOSTON CHAMBER OF COMMERCE. OUR EXECUTIVE COMMITTEE HAS DETERMINED THAT THE GREATER BOSTON CHAMBER OF COMMERCE IS THE ORGANIZATION TO WHOM WE WILL LOOK FOR BACKGROUND RESEARCH

AND GUIDANCE ON THIS ISSUE. WE ARE ASSURED THAT A SPECIAL COMMITTEE OF THE BOSTON CHAMBER OF COMMERCE WILL PROVIDE ITS RECOMMENDATIONS AND ANALYSIS OF THE VARIOUS OPTIONS BY MID-AUGUST. WE BELIEVE THAT BECAUSE OF THEIR GREATER STUDY OF THIS ISSUE AND THE FACT THAT THE MOST SIGNIFICANT ECONOMIC IMPACT WILL BE UPON THE BOSTON BUSINESS COMMUNITY, IT IS APPROPRIATE TO AWAIT THE RESULTS OF THEIR REVIEW. UNTIL WE HAVE THAT ANALYSIS, WE THINK IT IS NOT APPROPRIATE FOR US TO MAKE A MORE COMPREHENSIVE STATEMENT.

RESPONSE TO COMMENTS BY MASSACHUSETTS BUSINESS ROUNDTABLE, INC.
(August 9, 1983)

No response necessary.

**WRITTEN TESTIMONY AND
COMMENTS FROM PUBLIC HEARING**

Statement of Support

for the proposed

Third Harbor Tunnel and the Depression
of the Artery Project

Presented by: South Shore Chamber
of Commerce; President, John C. Doody
August 9, 1983

The Executive Committee of the South Shore Chamber of Commerce, on behalf of our 1400 member businesses, has unanimously endorsed, in principle, the proposed third harbor tunnel and the depression of the Central Artery.

Transportation has always been a major issue on the South Shore, highlighted with goals relating to the improvement of the Southeast Expressway, water transportation, rail freight and passenger service, mass transit, and local concerns such as the Fore River Bridge, Burgin Parkway, and Braintree Five Corners. All relate to improving both commuter and freight traffic in and out of Boston from the South Shore.

The benefits of your proposal are two-fold -- first, congestion on the artery going to and from the airport will be relieved. This will favorably impact upon the three major accesses from the South Shore, the Southeast Expressway, the MBTA's Red Line, and the water transportation system.

Second, improved traffic flow will directly help the future economic development of the South Shore; such as the North Quincy Business Park, downtown Quincy development, as well as other industrial and commercial sites in the South Shore.

It is essential that a consensus be reached on improving traffic conditions, so as not to jeopardize federal funding.

Based on the information submitted to the Chamber to date, we can speak in favor of the Administration's proposal.

Respectfully submitted for the South Shore Chamber of
Commerce
Richard C. Pierce
Richard C. Pierce, Manager, Public Affairs

RESPONSE TO COMMENTS BY SOUTH SHORE CHAMBER OF COMMERCE (AUGUST 9, 1983)

No response necessary.

TESTIMONY BY KRISTIN S. DEMONG, DIRECTOR OF THE
MASSACHUSETTS DIVISION OF EMPLOYMENT SECURITY,
AT THE PUBLIC HEARING ON THE RECONSTRUCTED CENTRAL
ARTERY/THIRD HARBOR CROSSING.

FANEUIL HALL: AUGUST 9, 1983

I am Kristin S. Demong, Director of the Massachusetts Division of Employment Security. Thank you for this opportunity to speak on the proposal to depress and widen the Central Artery.

Last Friday my office announced the Commonwealth's latest unemployment rate. Once again, Massachusetts posted an unemployment rate far below both the national average and the average of the 10 large industrial states. Why, then, am I here today to testify to the vital importance of this project to the Massachusetts economy and employment picture?

It's simple. Massachusetts' continued economic health depends on transportation--getting its people to and from jobs, sending its goods to market, stimulating consumer spending and, of course, attracting new industries and employers to the State.

None of us should forget that our strong position, relative to the rest of the country, is a recent phenomenon. Indeed, when the Central Artery was completed in 1959, our economic growth was so sluggish that not one office building had been built in downtown Boston since the onset of the Great Depression. An it wasn't until 1978 that our level of unemployment finally dropped below the national average.

TESTIMONY BY KRISTIN S. DEMONG
FANEUIL HALL: AUGUST 9, 1983
PAGE TWO

Neither should we forget that within the 92 cities and towns that make up the Boston Standard Metropolitan Area, there are over 95,000 people who want to work and can not find jobs. This project, which would create 5,000 construction jobs yearly and 10,000 permanent jobs, would have a significant direct impact on our economy. It would also generate a long-term ripple effect throughout the regional economy by increasing these workers' purchasing power and by strengthening our industries, like high technology and business services, which depend on regional markets.

We must consider, as well, the significant cost of not improving this roadway. Massachusetts has experienced literally generations of hardtimes and we must never assume that our present situation will continue without careful planning. To allow the further deterioration of the Central Artery will sharply limit the Massachusetts economy's ability to grow and to respond to the challenge of new technologies and changing markets.

Historically, Massachusetts' greatest economic asset is our talent to develop new industry and to adapt to meet the needs of these industries; an efficient transportation system is crucial to maintaining, let alone improving, Massachusetts' economic health.

For all these reasons, I urge you to approve this project.

Thank you.

RESPONSE TO COMMENTS BY MASSACHUSETTS DIVISION OF EMPLOYMENT SECURITY,
(AUGUST 9, 1983)

No response necessary.

Statement



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Boston, Ma. 02108
357-4380

IN REGARD TO THE DRAFT AND SUPPLEMENTAL DRAFT ENVIRONMENTAL
IMPACT STATEMENT/REPORT ON THE THIRD HARBOR TUNNEL PROJECT, INTER-
STATE 90/CENTRAL ARTERY, INTERSTATE 93, BOSTON, MASSACHUSETTS.
GIVEN BY CAROLE O. SONDUCK, LWM TRANSPORTATION SPECIALIST,
BEFORE THE JOTC, ON AUGUST 9, 1981.

Representing over 100 local organizations, the League of Women
Voters of Massachusetts has evaluated this proposal with regard
to its impact on regional transportation in Massachusetts. After
careful consideration, we have chosen to support the proposal
which incorporates depressing and widening the Central Artery
with additional access to the airport via the proposed alignment for
the Third Harbor Tunnel, alternative 5A or 3A modified.

The League's commitment to public transportation remains strong.
We worked to amend the Federal Aid Highway Act of 1972 to permit
financing part of the costs of urban mass transit from highway
trust funds. The League also supported the National Mass Trans-
portation Act of 1990. We believe that the proposed project is a
State Constitutional amendment allowing flexible use of highway
funds for public transportation.

Even with these changes in policy, the League recognizes the
reality that cities do not have the opportunity to plan and
adequately finance integrated transportation systems of their own
choice. We therefore urge that the state take steps to be taken
to allow cities and states the flexibility to build whatever
form of ground transit they deem necessary.

Transportation monies designated for Boston's third harbor tunnel
should be transferred to the state and spent there, rather than the
federal highway trust funds, which would probably be spent on
other projects in other states.

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double the amount of money received. The availability of large
federal grants for construction rather than maintenance and
operation unfortunately drives local decision-making.

A strong transit network is crucial to the viability of the
region. The League recognizes the need for a strong regional
transit system. The League of Women Voters believes that
on Urban policy states "The League of Women Voters believes that
it is in the national interest to promote the well-being of
America's cities." Clearly, improving mobility through and to
the Boston area will increase economic development and stimulate
growth, vital not only to Boston, but to the region as well. We
believe the proposed project is necessary to improve this
mobility, and thus Boston's well-being.

Environmental impact is another of our concerns. The proposal
reflects careful attention to air quality, water quality, noise
and vibration effects in Boston. We feel this project also
presents an unusual opportunity to increase safeguards and moni-
toring processes during and after construction. We urge stringent
standards and enforcement.

Another form of pollution is visual blight, and most would wel-
come elimination of the monstrous green giant which looms and
shadows Boston. What safeguards, however, will protect the 20 new
acres of land to be developed over the Central Artery? The
League urges careful planning and management of this potential
gift.

It is admirable that the most recent proposal does not "take" any
residential housing, thereby minimizing long-term disruption to
communities. The extent to which commercial "takings" are
discussed is also commendable, but we urge further study. Commer-
cial entities are not isolated units. Their disruption will
affect job changes which in turn affect families. In
addition, the disruption of the Central Artery will affect the
quality of life in the region. The disruption of housing in a community,
commercial "takings" have a definite impact on the region. Addi-
tional consideration of the individuals who will be affected by
these "takings" is needed. The people involved may be few in
number, but the impact on their lives and the region will be
great.

Recently, there has been discussion of possible public transpor-
tation for the proposed harbor tunnel. Restructured bus and
train service is being discussed. The League urges that
the proposed project be a part of a larger transportation plan
for the region. The League is not in favor of building a new
airport.

The cost of this enormous project is of serious concern. It is
imperative that the Commonwealth's 10% share not be drawn from
revenue potentially available to public transportation. In addi-
tion, the League strongly supports user cost-sharing measures to
provide funds for maintaining these roads.

We would like to thank the Executive Office of Transportation and
Construction for allowing the League of Women Voters to be
consulted on this project. We would like to thank the public in this pro-
cess. The availability of documents, the number and location of
meetings, and the extended hours for testimony reflect a sincere
effort under severe time constraints to maximize public partici-
pation. Thank you.

Contact: Carole O. Sunduck
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RESPONSE TO COMMENTS BY THE LEAGUE OF WOMEN VOTERS OF MASSACHUSETTS, CAROLE O. SONDUCY, LWM TRANSPORTATION SPECIALIST (August 9, 1983)

681. The Commonwealth recognizes the importance of careful design of parcels and control of development on these newly created parcels. Section 4.4.4 Joint Development contains a description of the process which will be implemented to ensure that proper attention is given to these issues. This process will continue to be refined throughout subsequent design phases of this project. The Section 106 Memorandum of Agreement, in COMMENTS AND COORDINATION, also requires careful planning and controls on the air-rights development.

682. The "secondary impacts" of commercial takings have been addressed in Section 4.3.3 Related Business Economic Impacts and Section 4.3.4 Community Economic Impacts. The psychological effects of business displacements have not been assessed. However, as is noted in Section 4.3, comparable relocation space exists in the area for displaced businesses. The Commonwealth believes it is important to consider the provision of special incentives to businesses to help them recoup any losses and to ensure that they relocate in the immediate area. Such measures will be investigated in the design phase.

683. Exclusive bus ramps connecting South Station to the Third Harbor Tunnel and the Southeast Expressway will provide a significant public transit benefit as part of the project. Other public transit improvements will continue to be developed by the Commonwealth, independent of this project. See Section 1.3 MAJOR POLICY ISSUES.

LEAGUE OF WOMEN VOTERS OF BOSTON

STATEMENT ON THE CENTRAL ARTERY/THIRD HARBOR TUNNEL

Presented by Betsy Johnson, Transportation Committee Chair

AUGUST 9, 1983

Where the League of Women Voters of Massachusetts has reviewed the proposed project as to its costs and benefits and effects on the overall region, the Boston League concentrated on the impacts on the city of Boston itself, particularly the effects on neighborhoods and the quality of city life.

The League of Women Voters' position is based on study and member consensus at three levels, national, state, and local. The local position's primary emphasis is for projects which provide a more efficient and extensive public transportation system.

There is a need to reduce the historic imbalance between mass transit and highway construction and use.

The transportation system must be balanced and projects must consider the entire transportation network. Our earlier objections to the third harbor tunnel arose because it was a piecemeal approach.

The proposed project may be massive, but it does begin to include an entire portion of the transportation system. Although the Boston League will continue to urge for upgrading and ongoing evaluation of further transit improvements to encourage greater use of public transportation to the airport, we also recognize

that public transit alone will not solve the future traffic problems.

At the original third harbor tunnel scoping hearing, the Boston League testified that four additional alternatives should be considered. We are pleased that three of our suggestions, particularly those concerning the central artery have now been included. However, the need to consider alternative transit

STATEMENT OF THE LEAGUE OF WOMEN VOTERS OF BOSTON

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options has still not been adequately addressed. There is the concern that if the project before us today is built there will be little remaining monies for the transit aspects of the system which also need improving. What commitments to transit can be included in this project?

We suggest that any tunnel include designated lanes and be part of a mass transit system between South Station and Logan Airport. We support the designated bus ramp from Dewey Square. Toll levels should be set high enough so as to be able to provide revenues needed for transit improvements.

Overall, the Draft Environmental Impact Report indicates a number of positive benefits to the project. From our local perspective, there is, most importantly, the opportunity to repair the negative impacts that resulted from building the central artery through city neighborhoods in the 1950's. The City can be again linked visually and physically by removing the elevated highway. Noise can be reduced and air pollution channeled. There is concern, however, that the reconstructed area will continue to be designed based on a street, the new surface artery. The parcels depicted in Figure 101, page 278, indicate this.

There must be much more discussion by citizens, land use planning of the entire corridor, and only then a determination of the configuration and uses of the parcels and roadways. Perhaps it would be best if it were impossible to go between the artery ramps on the surface, so traffic will not be tempted to use the surface to pick-and-choose its entry onto the artery. The Report does not adequately address the impacts of the use of the surface streets by

hazardous cargo trucks.

The surface street planning and design aspect to the project must be done simultaneously with the continued planning of the depression project. This is especially true since additional footings for higher buildings over the depressed artery must be constructed as the tunnel is being built.

The modifications to the 5A alternative reflect attempts to reduce the impacts on Boston's neighborhoods. The aim must continue to be to reduce commuter traffic and get commercial through-traffic off of neighborhood streets. The extension of I-90 to the expanding commercial/industrial area of South Boston is very much needed to reduce the disruptive truck traffic that now passes through the residential area.

Additional modifications to the exit ramp onto East Berkeley St. are needed. Traffic should flow onto an upgraded two-way Herald St. which is removed from residences, instead of onto Berkeley St.

Further consideration of alternatives concerning the relocation of Dorchester Avenue and the location of the tunnel beneath it is needed. The present configuration excessively impacts the Fort Point Channel. The Final Report should reprint Figures 71 and 73 (pages 14 and 15). The maps in the Draft Document make public review of the specifics of the proposals very difficult.

It is hoped that the Central Artery project could bring better coordination between the MDC Charles River basin plans and the other development plans in the adjacent area. The League requests that the measures to minimize the disruption in the Leverett Circle area (page 288) be implemented. Pedestrian access and walkways must be a priority in this area, and all modifications which could make the

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new bridges more attractive and reduce shadows should be implemented. Again, Figures 103 and 104 (pages 287 and 289) in the Draft Report are of very poor quality and make public review difficult.

Any modifications which minimize the disruption to the neighborhood and recreational facilities of East Boston should be adopted. The alternatives which require no taking of residences are to be commended.

The concern for the relocation of commercial establishments does not adequately address that there is a declining quantity of lower class commercial space in downtown Boston. Also there is insufficient discussion as to whether nearby businesses will be able to withstand the disruptions (noise, dirt, limited access) caused by the construction. What will be the real economic costs of the construction? Will those hurt by the construction be able to share in the after construction prosperity?

The League of Women Voters of Boston thanks you for this opportunity to participate. We ask that public participation continue to be a priority of the project. An outline of the ongoing public participation process should be in the Final Document. We suggest that neighborhood by neighborhood project committees be established and meet often. A number of decisions affecting residents, which have just been mentioned, need community input soon.

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RESPONSE TO COMMENTS BY THE LEAGUE OF WOMEN VOTERS OF BOSTON, BETSY JOHNSON,
TRANSPORTATION COMMITTEE CHAIR (AUGUST 9, 1983)

689. & 690. The project incorporates the South Station Transportation Center which includes ramps specifically designed for buses to provide express service between South Station and Logan Airport. See Section 1.3 for a discussion of the Commonwealth's commitment to transit and how the Preferred Alternative best provides this commitment. Tolls from Interstate Highway projects cannot be used to fund local mass transit improvements.

691. The Commonwealth recognizes the importance of careful design of parcels and control of development on these newly created parcels. Section 4.4 Joint Development contains a description of the process which will be implemented to ensure that proper attention is given to these issues. This process, which involves a great deal of public participation, will continue to be refined throughout subsequent design phases of this project.

692. All regulations with regard to hazardous cargo trucks on local surface streets will be followed. A discussion of the movement of hazardous cargo through the project area is included in Section 4.2.7 Safety.

693. See response to Comment No. 691, above.

694. The Preferred Alternative will result in reduced commuter and commercial traffic on local South Boston streets. See Section 4.2.2 Traffic Volumes. The Seaport Access alignment of the Preferred Alternative includes the extension of Interstate Route 90 to the commercial/industrial area of South Boston. As is discussed in Section 4.2 TRANSPORTATION, this alignment will remove large numbers of trucks from local neighborhood streets.

695. As a result of public input, the Preferred Alternative includes a redesigned South Bay interchange with a new Herald Street Extension. Accordingly, traffic from the Seaport Access tunnel will be directed onto two-way Herald Street Extension, rather than onto East Berkeley Street.

696. The Preferred Alternative represents the alignment which causes the least disruption to Fort Point Channel while still providing the desired transportation benefits. See Sections 4.16 AESTHETIC IMPACTS and 5.2.3 Fort Point Channel District for a detailed description of the effects of this alignment and the proposed measures for mitigating these effects.

697. The Commonwealth is working to coordinate the MDC Charles River Basin plans with other development plans in the area, including this project, the MBPW's North Area Project, and plans of the BPA and MDC. Proposed mitigation measures include facilitating the MDC's acquisition of more land along the banks of the Charles River. See Sections 4.4.3 Preferred Alternative (re land use impacts), 4.16 AESTHETIC IMPACTS, and 5.1.3 Charles River Basin Reservation for a detailed discussion of the plans for this area, coordination efforts, and mitigating measures.

698. The Preferred Alternative represents the least disruptive alignment to the East Boston community, while still providing the desired transportation improvements. The tunnel surfaces at Logan Airport, with no relocation of East Boston residences. (None of the alternatives considered in the EIS/EIR required residential displacements.) Air quality and traffic conditions in East Boston will improve as a result of this alignment. At the East Boston Memorial Stadium, the overall addition of approximately 3 acres of land to the

East Boston Memorial Stadium is incorporated into plan design as part of Section 4(f) mitigation. See Section 5.1.1 East Boston Memorial Stadium. Air and noise quality will also improve at the Stadium as a result of the project (see Sections 4.7 AIR QUALITY and 4.8 NOISE AND VIBRATION).

699. Construction disruption to businesses is examined in Section 4.6 ECONOMIC IMPACTS. Section 4.3.2 Displaced Businesses and the Availability of Comparable Relocation Space, Section 4.3.3 Related Business Economic Impacts, and Section 4.3.5 Massachusetts Department of Public Works Relocation Procedures presents relevant information regarding the business displacements and relocation benefits. Additionally, the Commonwealth will explore other mechanisms to minimize EOTC business impacts and will work with the City in this effort.

700. Community participation has been and will continue to be an integral part of the planning and design process for this project. Section 4.4.4 Joint Development includes a discussion of the mechanism to continue public inputs during the design process.



Boston Educational Marine Exchange
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COMMENTS ON THE THIRD HARBOR TUNNEL/VIADUCT & DEPRESSIONED CENTRAL ARTERY EIS
PRESENTED BY THE BOSTON EDUCATIONAL MARINE EXCHANGE AT THE PUBLIC HEARING, 8/9/83

The Boston Educational Marine Exchange objects to the adverse impact of the Third Harbor Tunnel/VIADUCT and Depressioned Central Artery plan on the Fort Point Channel. The Environmental Impact Statement does not adequately consider the value of the Channel itself and its potential to fill important recreational, tourism, marine commerce and water transportation needs of Boston and Massachusetts. Nor has the Environmental Impact Statement adequately considered alternative transportation modes including ferry service which, taken together, could considerably ease traffic on existing roadways.

A surface roadway along any portion of the downtown Channel edge is objectionable and would be inimical to recreational use. One would think that with the downtown portion of the Southeast Expressway (Central Artery) starting up in the fact that this would be generally realized.

The Environmental Impact Statement has not taken into account potential use of the Channel as a downtown harbor for boats with the attendant recreational and development activities and tourist dollars to be gained from such a waterfront attraction. The City lacks docking and other facilities for boats. The Fort Point Channel, a "harbor of refuge" at the core of downtown, is a logical place for boats and, in fact, has been designated for this use in the City's plan for the Harbor.

As proposed by the Boston Educational Marine Exchange, the Channel could accommodate as many as 1500 boats, with a possible 600 power boats above the Summer Street Bridge. Public landings, ramps, water taxi terminals, a breakwater/

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Boston Educational Marine Exchange
Public Hearing Comments on Tunnel/
Artery, 8/9/83

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plan for visiting tall ships and cruise ships, a promenade along the Channel edge with attendant cafes, restaurants and other amenities are all part of this exciting proposal. (See accompanying poster.)

Next year the Tall Ships will visit Boston and, again, there will be no place for them downtown. In addition, the Antique and Classic Boat Regatta, a new annual event, anticipates 100 boats. Where will we put them? For two years now the Fort Point Channel has provided the site for a brave new boat show. There is no question that boating events are popular with the public; they also enrich the coffers of the city and its merchants. There is no reason why, in the future, a marine oriented Channel couldn't be as big a draw (or bigger) than Annabols or Newport -- both multi-million dollar affairs.

The EIS has not sufficiently addressed impacts on the marine recreational use of the Channel nor the question of revenue accruing to the City from such development. Per boat spending on restaurants, supplies, recreational shopping and the like would amount to considerable in a season, as would income the City would reap in property taxes from marine assessments.

Annabols and Newport have turned private pleasure boating into by far their major economic activity. Any EIS on the Tunnel/Artery should certainly look at potential revenue that would be generated by a recreational boating complex in the Fort Point Channel.

The EIS has not covered impacts on the Channel's potential use as a water transportation arm to the new South Station Transportation Center. Streamlined waterbuses similar to those used so effectively in Amsterdam could fit under the bridges and call at a South Station landing at the foot of Summer Street to speed passengers to Logan Airport, North Station and other harborfront destinations. This would also help alleviate traffic downtown.

The question of density of projected development in the Quincy Square/Fort Point Channel area and the need for the breathing space a Channel recreational area could provide needs to be considered.

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A surface roadway, so-called "New Dorchester Avenue" in the Tunnel/Artery plan, along the edge of the Channel is antithetical to recreational use of the Channel. Who wants to promenade along a highway or, for that matter, sit on a boat deck beside rushing cars. This would also be a deterrent to sidewalk cafes and other commercial recreational development along the waterfront. A classic mistake cities have come to regret is putting roadways along their waterfronts.

Alternative transportation measures to ease traffic congestion have not been looked at in the EIS and need to be before a decision on the Tunnel/Artery is made. Area boat operators are eager to run ferry service from the South Shore to downtown and Logan; all they are waiting for are the landings. Massport is willing to provide a landing at Logan. The City is requiring the developer of Rowe's Wharf to provide a ferry terminal. A landing in the Channel could make the ARTMAK and bus station connection. Ferries with connector bus links, revived train service along the Old Colony Line, improved T service, park and ride, subscription bus services, van-pool could all act to alleviate traffic from south of Boston into and through downtown. In fact, the process of finding alternative ways is already underway in part due to the impetus of the Southeast Expressway reconstruction.

Time and time again, grandiose building plans have become obsolete scarce. They have been completed. There is a need for the EIS to project its vision and imagination into the future. 13 years from now, the anticipated completion date of the Tunnel/Artery project, use of the private car in the city may be on the wane with totally different forms of people movers taking its place.

The Fort Point Channel offers a dramatic opportunity to reintroduce a rich variety of marine activities of a contemporary nature at the very heart of downtown Boston. Tunnel/Artery impacts on this potential need to be thoroughly examined before a decision is made.

RESPONSE TO COMMENTS FROM BOSTON EDUCATIONAL MARINE EXCHANGE (August 9, 1983)

701. The Preferred Alternative has been designed to minimize impacts on Fort Point Channel, and will actually provide greater accessibility for pedestrians and allow easier development of marina uses in the Channel. Changes to the design in this area resulted from comments by the Boston Educational Marine Exchange and other interested parties.
702. The project will not affect navigation in Fort Point Channel and will not have a negative impact on its development for marina use.
703. The project does not restrict navigation in Fort Point Channel.
704. Adjacent to new Dorchester Avenue, but separated from it by landscaping and in some cases a change in grade, will be a pedestrian walkway. A pedestrian deck will be on a lower level promenade and will be suitable for development of passive recreation uses.

PUBLIC HEARING FOR CENTRAL ARTERY, INTERSTATE ROUTE 93 AND THIRD HARBOR TUNNEL, INTERSTATE ROUTE 90 IN BOSTON, MASSACHUSETTS

TESTIMONY OF ANTONIO DIAMABRO

My name is Antonio Diamabro. I am a North End resident.

I recognize the need and importance of studying the roadway improvements included in the Supplement to the Draft Environmental Impact Statement/Report entitled Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93. Overall, I believe the Supplement EIS is a sensitive study that offers a range of preliminary solutions to the present and future problems related to the regional traffic and roadway system.

However, as a resident of the North End, I am very concerned about the serious impact that the projects will have on my neighborhood. The EIS clearly outlines the impact in terms of dust, noise, traffic congestion, loss of parking spaces and accessibility. The EIS only hints at the long-range impacts and leaves undefined the future development of new parcels of land that will be created by the depression of the Central Artery. The mitigating measures are only loosely defined, and City and State commitments to enforce such measures are not properly articulated. Before the study proceeds, I urge the authors of the EIS or its sponsors to further elaborate on these matters.

Although it is a neighborhood in flux, the North End still retains its character as a semi-isolated, cohesive, vibrant community, one that adds to the cultural diversity of Boston and embodies much of

its history and richness. It is one of the nicest neighborhoods in America. It is a pleasant place to live, and it has a shopping/eating district that serves a large ethnic and non-ethnic population in the metropolitan area. What will happen to this unique urban environment if the Central Artery is depressed or restructured?

Although I believe that the neighborhood will continue its natural process of transformation, the artery improvements will accelerate this process. The North End is a neighborhood in transition. It has been such for quite some time, and it will continue to be in transition independently of the artery improvements. Changing real estate patterns, condominium conversions, poor parking and accessibility, gentrification and displacement, and increases in rent levels are already evident in the North End. The population is also changing. More and more professionals are moving into the neighborhood. Thirty percent of the population is elderly. Forty-two percent are unemployed. Many of the old residents pay between \$125-200 per month in rent for a one or two bedroom apartment, while newcomers pay \$400-600. About 45% of the real estate is controlled by absentee landlords, and much of the housing stock needs improvements and repairs. For how long can the North End community withstand the pressure to transform?

At this crucial point in the North End's history, I see that the residents have basically two choices: opposition or constructive participation. Residents could oppose the depression of the artery and let the natural process of neighborhood transformation carry on. Or they could recognize that transformation is inevitable and use the

issues and opportunities created by the artery improvements as a means to unify the community and become primary actors in the definition of its future. I have opted for the second strategy because I believe in the long run it will be the most effective and successful one.

I strongly urge the State and the City to show with facts their commitment to facilitating the process of constructive participation of North End residents in the decision-making process before, during and after the implementation of the proposed artery improvements. It is crucial that this process be tailored to the specific needs and characteristics of the North End population. I would like to offer the following suggestions as minimum requirements for a meaningful and effective process:

- The State should institute and finance a North End Resident's Forum that will allow residents, businessmen, and neighborhood institutions to freely express their opinions, concerns and choices. It is in the context of this Forum that residents must ask themselves and answer fundamental questions such as: What is the future of the North End? Does a cohesive ethnic community have a right to remain, live and prosper in the heart of Boston? Can the North End community as a whole benefit from the depression of the Central Artery? What are the restrictions that should be placed on the development of the parcels of land along the Central Artery, who is going to develop them, and who will benefit from their development?

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- Residents need to be continuously informed about the various aspects of the project. At the same time, they must have an opportunity to hear their own consultants or technical advisors in order to formulate their own positions. The State must pay for the technical assistance that the residents will require throughout the process.
- Before the proposed projects proceed, a detailed memorandum of understanding must be drafted and signed by the State, the City of Boston, and the North End Community. This memo must contain all the guarantees that the community will require to support the depression of the artery. It must precisely articulate all the mitigating measures necessary to cope with concrete issues such as noise, parking shortage, traffic rerouting and congestion, lack of accessibility, loss of business, etc. Finally, the memorandum must indicate that the State and the City are strongly committed to conducting more in-depth studies of the long term effects that the depression of the Artery will have on the community. The State and the City must strongly commit themselves to developing and implementing the mechanisms that will mitigate and hopefully reverse the negative and disruptive trends that will undermine the quality of life in the North End. If the content of the memorandum is not honored by the parties involved, then the community will undertake the necessary legal actions. The State must commit itself to pay for all the legal expenses that may be necessary to defend the community.

The North End community must be the prime beneficiary of the future air-rights developments. These developments must be tightly controlled in terms of use, density, and urban design quality. This control must be exercised now and during the design phase. North End residents cannot wait until the Central Artery is depressed to know what will happen on these parcels of land. They have the right to affect and control the developments because they more than anyone else will put up with 15 years of disruption to their lives.

If the State and the City are ready to strongly commit themselves to the above points, then I am ready to give my cautious support to the proposed artery depression. I say cautious because even though I have a lot of trust in the current State Administration, I know that administrations come and go. The North End is a living national treasure; it will be a disgrace for Boston, for Massachusetts, and for America if it will be dismantled or if it will be transformed into another Society Hill or Beacon Hill without the consent of its residents.

The North End is an important part of our city's history, and I sincerely hope that the process for its future transformation will be a model for other cities that face similar problems. The process requires a passionate and constructive involvement of the North End residents and the support of every citizen of Massachusetts from Chatham to Roxbury, from Gloucester to Provincetown, from Wellesley to Worcester. We need this support for the next 15 years.

Antonio DiMauro
Presented August 8, 1983
Faneuil Hall, Boston, MA

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RESPONSE TO COMMENTS BY ANTONIO DIMAURO, 161 ENDICOTT ST., BOSTON (August 8, 1983)

705. The uniqueness of the North End neighborhood and the existing pressures for its transformation are recognized in Section 4.4 LAND USE and 4.5 NEIGHBORHOOD AND COMMUNITY FACILITIES of the FEIS/FEIR. As suggested in this comment, it is very difficult to assess whether the process of depressing the Central Artery will or will not accelerate current pressures to change the character of the North End. As noted, most of the causes of these changes in rents, ownership patterns, and demographic mix operate independently of the project and may well have run their course by the time the project is completed in the late 1990s. Assessing the specific course of events which depend on trends outside the project's control and on such a multitude of individual choices over the next ten to fifteen years cannot be done with any certainty. Thus, the FEIS/FEIR addresses this difficulty by illustrating the range of probable future changes in the North End.

706. Suggestions for the establishment of a process for constructive participation of North End residents in decision-making about the project has been studied and expanded to include other neighborhoods. The proposed mechanism for business and residential community input into Joint Development decisions is described in Section 4.4 Joint Development sub-area (i.e. Basically, BRTC/MOPW will establish and coordinate sub-area (i.e. neighborhood) task forces to focus on establishing specific development guidelines (such as foundation requirements, building envelope constraints, architectural character, permissible uses of abutting parcels, etc.) and supervising their integration into final design documents and specifications. To support these activities, each subarea task force would have direct access to technical and financial consultants. Specific details of the mechanism for establishing these task forces will be worked out during preliminary design to ensure timely incorporation of air rights development foundation and Artery ventilation requirements into design of the project.

The Greater Boston Group of the Sierra Club welcomes this opportunity to comment on the Draft Environmental Impact Statement and Supplement to that statement (DEIS/DEIS) on the proposed 337-mile, \$1.2-billion New England Superconducting Accelerator. It is indeed a formidable document. After a thorough review of the DEIS/DEIS, the Sierra Club believes that the proposed Superconducting Accelerator highway project ever proposed in the Commonwealth. The Sierra Club hopes that the planners and engineers in the Massachusetts Department of Transportation will consider carefully all the concerns and criticisms of knowledgeable citizens who are affecting millions of people daily.

Historically, the Sierra Club has supported the depression of the Central Valley and the reservations concerning the overall planning objectives and the Sierra Club has traditionally opposed them. In particular, the Club has been very vocal in its opposition to the proposed Central Valley Project. This opposition was based on the fact that the project was a massive dam and reservoir project which would have had a profound impact on the Central Valley. The Club has been very vocal in its opposition to the project and has been successful in getting the project delayed and modified. The Club has been very vocal in its opposition to the project and has been successful in getting the project delayed and modified. The Club has been very vocal in its opposition to the project and has been successful in getting the project delayed and modified.

Overall, the Draft Environmental Impact Report (DEIR/DEIS) indicates a number of positive benefits to the city from the Sierra Club perspective, the most important opportunity to reverse the negative impacts that have resulted from building the Central Artery through the city's neighborhoods in the 1950s. Done correctly, a depressed Central Artery can be used to improve visually and physically the city. Without the elevated highway, noise can be reduced and air pollution channeled.

Where are the transportation planning objectives of the state planning agency for the first time?

There is concern that the reconstructed surface area will continue to be designed based on a street, the new surface. Why the parcels depicted in figure 4-2 indicate this is a mystery. The parcels depicted in figure 4-2 are not the parcels that were discussed by citizens and then land use planning of the entire corridor and only then a determination of the configurations and uses for the parcels and roadways. Perhaps it could be best if it was impossible to go between the artery and the surface to pick-and-choose. If its entry onto the artery. This planning and design aspect to the project must be done simultaneously with the continued planning of the depression project. This is especially true since additional footings for the depressed artery would be constructed as the tunnel is being built.

No mention is made of when decisions on the new surface structures will be made. Who will be paying for the new foundations? The federal Government? The Commonwealth? The Council? The local government? The private developer? The emancipated developers? Now fall will the new buildings be and how many of them will be built? These questions should be addressed to the public. Citizens will have an opportunity to picture the final product of a depressed area.

The planning of the combined Expressway-Tunnel project is fatally flawed by the total absence of any analysis of possible new public transportation access to Logan Airport, nor of any possible creative public transportation use of the expanded capacity of the proposed depressed central artery. It is the position of the Sierra Club that unless and until such planning is included, we are opposed to a Third Harbor Tunnel.

The project before us proposes a substantial increase in capacity at the central artery and a doubling of the transfer capacity at the West Beach and Logan airport. It is the Secretary's position that some of this increased capacity must be devoted to improved public transportation.

Translocator study has been given to the recreational and open space needs of the community. If this project fills the need, space will be available and how can this project fill the need? Parks are not sufficient to add a little landscaped open space where there is no convenient, parks are a real urban environmental need that must be met. There is no reason to depress the Central Artery if the end result will be surface conditions that still divide the city, hinder pedestrian traffic, and add no recreational areas.

The Army project conflicts geographically with two proposals that are essential and would drastically upgrade the water quality in Boston Harbor and on Boston beaches. The first is the Lawrence Channel and the West Side Interceptor at Atlantic Avenue, and the second is the Sewer Overflow facility planned for the Fort Point Channel. The completion of these projects is a prerequisite to this project. The raw sewage from all downtown is presently running into the harbor and this project will obstruct its correction at a later date.

Traditionally, the Sierra Club has opposed a Third Harbor Tunnel. Our primary reason stems from the failure to consider the impact of an ever-expanding Logan Airport. While we do recognize the potential benefits of diverting airport traffic to the Central Artery, we fail to see how this traffic can be handled once it arrives at airport with limited parking. We believe that a Third Harbor Tunnel will only serve to increase traffic and lead to increased air and noise pollution.

Why is the use of our regional airports, like Worcester, not considered for diverting more of the connecting traffic to Logan? The over-expanding use of Logan airport is a serious problem. The use of regional airports is not increased and not encouraged. There is a growing need to use regional (Massachusetts, New England) air and rail transportation both to connect the use of our airports and to connect the use of our railroads. The use of regional airports could also encourage transportation and the growth of the region. Greater participation in a mass transit system would be a great benefit to the region.

CONCLUSION

DPM

Those responsible at ~~the~~ must broaden their policy objectives to genuinely integrate other design disciplines, and not merely pay them lip service. The necessary balance requires that adequate budgets for urban design, landscaping, joint development, and participation by city planning and urban design departments be built into these projects at the outset. The DPM/DEIS process is not a panacea. Otherwise we shall be doomed to mediocre plans in spite of the billions to be spent.

To maintain minimum standards for the proposed projects provision must be made for:

- 1) Urban design control of the highway engineering proposals.
- 2) Design control of the streetscapes and open spaces.
- 3) Design control of joint development.

~~the DPM/DEIS~~ This can be accomplished by including professionals from outside planning agencies and be able to choose professionals to help them in their reviews. Of course, budgets must be included for these groups.

It is imperative with a project of this size that public participation continue to be a major force for change. The Sierra Club is encouraged by Secretary Salvucci's effort so far in working with citizen's groups. We look forward to continuing our dialogue as the planning for the Central Expressway and Third Street Tunnel proceeds in any format. Thank you for this opportunity to comment.

Submitted by: Gerry Ives, Elizabeth Johnson, William Lamb, John Lewis, Louise Lewis, Ernest Lowenstein, Robert McLean, and Nancy Seidman for the Greater Boston Group of the Sierra Club.

RESPONSE TO COMMENTS FROM THE SIERRA CLUB (August 8, 1983)

Please see responses to written comments by the Sierra Club.

Eastern Air Lines supports the construction of a third harbor tunnel if it will provide improved vehicular access to the airport for the traveling public, and in addition, will reduce traffic congestion on airport roads and in neighborhood streets. Eastern has been serving Logan Airport for a long time. We have developed an excellent facility here and have no desire to see its efficiency eroded.

After attending a number of the working sessions and after reviewing the supplement to the draft environmental impact statement report, we are very concerned with what will happen to our airport facilities if Alternative 5A modified is the selected alternative. Three of our facilities are in the direct path of the tunnel. New buildings, at least equal in size and function, must be built in the airport to replace them.

The first of these facilities is our New England Reservation Center. A new Center must be constructed at a site remote from the tunnel. The proposed undergrounding of the existing building is unacceptable as the computers and telephone switching equipment cannot be subjected to vibrations caused by construction activity or by traffic passing through a completed tunnel under the building. The associated parking lot of approx. 400 cars must also be relocated.

The second of these facilities is our air freight building. The freight operations must be relocated temporarily to another building during construction of the tunnel. The present building will be removed. After backfilling of the tunnel, our air freight building can be rebuilt on the same site. The tunnel sections will be designed to support a three to five story structure. We recognize that there is no direct roadway access shown on the drawing between the second aircraft building and the new Bird Island Flats Road. But we also know that the new road will be built and the present road will be widened. We will ensure that all the Bird Island Flats traffic from circulating the main airport road system.

The third facility is the underground aircraft fuel tank system. Some of these tanks can be relocated to a remote site leaving several tanks and the piping system in place. An underground supply pipeline will be required between the two sites to provide a method of trickle feeding the tanks that remain in place.

The operation of these three facilities cannot be interrupted for a single minute. The temporary and permanent buildings replacing these facilities must be built, completely furnished, and operating before we will move out of the existing facility. In all cases, the duplication of equipment will be required as moving will be phased over one or two nights. This includes duplication of the computer and telephone switching equipment in the Reservation Center.

In addition to the extensive work and relocations required for these three facilities, we are also concerned about our terminal and hangar operations during the construction period. Two temporary concourses must be built in order to maintain normal flight schedules. One concourse will be used by commuters who will be displaced by the construction of the second temporary concourse, to be used by the Air Shuttle aircraft. Both concourses will extend from the back of the terminal concourse. South. Shuttle operations will be moved to the second temporary concourse. Both Air Shuttle and commuter aircraft will be dismantled and the computers will be relocated to the present Shuttle Satellite. Both Air Shuttle and commuters will be returned to their original locations after the tunnel is completed.

Cont'd.

The interchange of Shuttle and the commuter aircraft is required to allow the hangar to operate 24 hours a day. The smaller commuter aircraft parked around the Shuttle Satellite will allow L-1011 access to both sides of the hangar.

We are also concerned with debris, dirt, and dust, from construction work so close to operating aircraft. Dust can cause serious damage to aircraft engines by jet engines. It will be necessary to take every precaution known to the construction industry to prevent this.

Finally, we understand that the cost of all relocations, phased construction, temporary buildings, special equipment and moving expenses will be a part of the overall budget of the tunnel part of the project. Eastern Air Lines will not pay for any activities caused by the construction of the tunnel.

RESPONSE TO COMMENTS FROM EASTERN AIRLINES (August 8, 1983)

Please see responses to Eastern Airlines written comments.

GOOD AFTERNOON LADIES AND GENTLEMEN:

I APPRECIATE THE OPPORTUNITY TO PRESENT MY REMARKS ON THE PROPOSED

THIRD HARBOR TUNNEL AND DEPRESSING OF THE CENTRAL ARTERY. BY NAME IS

DAVE FORCARO AND I RUN A FAMILY OWNED TRUCKING COMPANY IN EAST BOSTON.

ESTABLISHED SOME 35 YEARS AGO AT LOGAN AIRPORT CALLED PAROCHELLI---

DAVE'S MOTOR TRANSPORTATION, INC. I AM HERE TO DISCUSS A VERY IMPORTANT

AND SOMETIMES OVERLOOKED PHASE OF BOSTON'S LOGAN AIRPORT - AIR CARGO.

DAVE'S IS THE AUTHORIZED CARGO REPRESENTATIVE OF BOSTON'S AIRLINES

AND SOME OF LOGAN'S MAJOR AIR FREIGHT FORWARDERS AND SERVES AS THE VITAL

HIGHWAY LINK BETWEEN LOGAN AIRPORT AND NEW ENGLAND'S BUSINESS COMMUNITY.

AS WE SERVE THE ENTIRE REGION THRU LOGAN NOT JUST BOSTON. FOR EXAMPLE:

THE CARGO PICK-UP AND DELIVERY TERRITORY EXTENDS NORTH TO SOUTHERN MAINE,

ENCOMPASSING A GREAT DEAL OF NEW HAMPSHIRE; WEST THRU WORCESTER COUNTY,

AND AS FAR SOUTH AS NEWPORT NEWS ISLAND. IN ADDITION, BOSTON'S LOGAN

IS CONSIDERED BY THE AIRLINES AS A CARGO HUB, MEANING THEY SUPPORT THEIR

AIRCRAFT FROM NOT ONLY BOSTON AND SEATTLE, BUT ALSO DEPOT ON PRE-PAID

CONTAINERS FROM SUB-STATIONS IN BARTFORD, CT., WASHINGTON, D.C., PORTLAND,

MAINE AND PROVIDENCE NEWS ISLAND TO ESTABLISH THEIR ESSENTIAL LOAD PATTERNS.

THE NEW ENGLAND BUSINESS COMMUNITY HAS CONVERTED TO AIR CARGO AS A

NECESSARY WAY OF LIFE. MORE THAN 4000 DIFFERENT COMPANIES IN THE REGION

SHIP OR RECEIVE GOODS THROUGH LOGAN'S CARGO FACILITIES. INDUSTRY HAS

COMMITTED TO AIR IN ORDER TO REDUCE INVENTORIES AND FINANCING COSTS, AS

WELL AS INSURANCE, INSURANCE, AND PACKING COSTS. IN ADDITION TO TIME

SAVED IN TRANSIT.

IT HAS ENABLED THIS REGION TO COMPETE IN THE "WORLD MARKET PLACE."

AIR CARGO IS A VERY TIME SENSITIVE COMMODITY. UNLIKE A PASSENGER (LIKE

J.J. SIMPSON ON THE AED) WHO CAN ARRIVE AT THE AIR PORT MINUTES BEFORE

DEPARTURE, CARGO MUST BE ON-LAND UP TO TWO HOURS BEFORE SCHEDULED AIRCRAFT

DEPARTURE. MINUTES DO MAKE A DIFFERENCE. FOR EXAMPLE: THE ONE-DAY TOLL PASSENGER RECENTLY PUT INTO EFFECT RESULTED IN AN AVERAGE FIVE MINUTE REDUCTION OF SOME 9 MINUTES. THIS HAS ALREADY MEANT THE DIFFERENCE IN SOME CASES OF CARGO BEING 5,000 MILES AWAY IN A DISTANT MARKET THE NEXT MORNING RATHER THAN STILL SITTING ON THE BOSTON LOADING DOCKS. IT WAS A STEP IN THE RIGHT DIRECTION, WE NEED MORE PROGRESSIVE THINKING - THE THIRD HARBOR TUNNEL AND DEPRESSING OF THE ARTERY IS A GIANT STEP TOWARDS ASSURING LOGAN'S VIABILITY IN THE FUTURE.

AIR FREIGHT HAS BEEN DOUBLING EVERY FIVE YEARS, AND DISCOUNTS ARE THAT THE FUTURE OF AIR CARGO IS BRIGHT AND PROMISING PROVIDING WE CAN MAINTAIN OUR EXPEDIENT, RELIABILITY, CONVENIENCE AND SPEED.

THERE ARE TWO MAJOR FACTORS THAT HAVE HELPED SPUR THIS GROWTH. ONE IS THAT THE EUROPEAN AND FAR EASTERN MARKETS, WHICH ARE MAJOR PRODUCERS OF HIGH VALUE, LOW DENSITY GOODS SEE AIR CARGO AS THE FASTEST METHOD TO GET THEIR PRODUCTS TO AND FROM OUR TECHNOLOGY ORIENTED NEW ENGLAND MARKETS.

SECONDLY, IF UNTIL NOW, WE HAVE HAD THE VISION TO EXPAND OUR AIRPORT RESOURCES TO MEET THE TECHNOLOGICAL SOPHISTICATION THE AIRLINES HAVE BROUGHT ABOUT IN AIR TRAVEL.

WE ARE GOING TO HAVE TO CONTINUE THAT VISION IF WE WANT TO KEEP PACE WITH CHANGING TIMES. THE CENTRAL ARTERY AND THE SUMNER-CALLAHAN TUNNELS ARE THE PRODUCT OF THE PROPELLER AGE AND PRE-DATED TODAY'S INTERSTATE HIGHWAY SYSTEM. THE VISION WE NEED IS TO THE JET AGE, AND REDUCED TRAVEL TIMES, EASIER AND BETTER ACCESS TO NEW ENGLAND'S GATEWAY TO THE WORLD.

WE CAN ALL AFFORD FURTHER COMPETITIVE DISADVANTAGES IN THE WORLD MARKET PLACE BY REDUCING LOGAN'S ACCESS AND EFFECTIVENESS.

WE MUST BE SUPPORTIVE OF THE THIRD HARBOR TUNNEL AND DEPRESSING THE CENTRAL SO THAT THE FUTURE INTERESTS OF THE CITY OF BOSTON, THE COMMONWEALTH AND IDEALLY ALL NEW ENGLAND ARE SERVED.

THANK YOU.

RESPONSE TO COMMENTS BY DAVE'S MOTOR TRANSPORTATION, INC.

No response necessary.

NORTH END NEIGHBORHOOD TASK FORCE

50 NORTH END UNION, 20 PARMENTER ST.
BOSTON, MASS. 02113 TEL. 227-2527

August 8, 1983 - 7:10 p.m.

My name is Emilio Pugliano, I am president of the North End Neighborhood Task Force, am a member of the City of Boston's Environmental Commission, and I am a life-long resident and property owner of the North End with no intentions or plans to move.

I wish to thank Secretary Salvucci for the opportunity to speak and to congratulate him on the sincere efforts to listen to, and inform, as many people as possible in such a short space of time. I will not dwell on past errors and injustices perpetrated against at least three communities and this City, as a whole, when the inadequate and ugly Central Artery was built. We can only go forward and plan for the future and this I am told is what this is all about. However, we are told the pot of gold at the end of the rainbow will be 13 years away. The question then arises on how do we get through these 13 years without serious health, safety and financial losses. I cannot give an unequivocal endorsement to the Draft Environmental Impact Statement which is supposed to be Step No. 1. There are too many unresolved and inaccurate statements. I will not take the narrow and parochial path and speak only of how much the North End will suffer and your engineers say we will get the

worst of it. All of us in East Boston, Charlestown, the South End, South Boston and the North End are going to be hurt badly by a \$2 billion plan to bring more cars into the city and speed them on their way out of the city via the Airport. Since we are also the taxpayers who paid that \$2 billion, it would seem that we are paying twice. The residents need the merchants and the merchants need us. Although you say there will be very limited land takings, there are job losses all along the route. There must be legal and written guarantees. We demand this. Good will and good intentions prevail now, but the Secretary cannot be everywhere. There will be deadlines to meet and powerful lobbies and unions to appease. Water backing up into my cellar, power failures, suffering merchants who must increase their prices to survive or who move somewhere else, noise, dirt, rodents, rerouted transportation are some of the conditions which will turn a viable community into a wasteland. Undoubtedly the residents will be looked upon as expendable, but what about the thousands of people who come into the area to earn their living, attend our five educational institutions, partake of recreational facilities, etc. This is an enormous undertaking, but we cannot lose sight of the fact that life must go on day in and day out. The Artery is your first priority, but not ours. Our utmost priority is survival as a community. So, again I say, we DEMAND legal and written guarantees in all those areas in which survival is impacted whether it is jobs, equitable relocation costs, parking and traffic regulations in

our favor, as opposed to the construction workers, tax and insurance adjustments, etc. We have problems in the North End and it is damn hard getting the City or the State to listen. This project will only exacerbate them. It has been said that there was a whole class at Harvard that never knew what Harvard Square looked like because they were building a subway. That meant four years. Well, our kids have 13 years of misery to look forward to. By that time, some of us in this room will be upstairs or downstairs with the angels or the devil, having been transported there without the benefit of either a depressed or elevated Central Artery, but I happen to care about what happens to the next generation not only in the North End but about this whole City. We are a livable, walkable city and lately I don't like what we're becoming. We don't have to become a highly polluted facsimile of L.A. with its freeways or have a skyline like New York's when we have the beauty and dignity of the Charles River and our Harbor.

You tell us that land will free up when the Artery is depressed. Just remember, that is our land. One of our boundaries used to be Scollay Square. North Street, Hanover Street, Salem Street, Endicott Street, Traverser Street are in the North End now, used to be extended, and we now reclaim them. The project is just beginning and the thinking people of my neighborhood are full of ideas and we put you on warning that we will not be stifled as we were in 1930. Both you and us are a lot wiser and smarter.

Thank you.

RESPONSE TO COMMENTS FROM NORTH END NEIGHBORHOOD TASK FORCE (August 8, 1983)

707. This statement on behalf of the North End Neighborhood Task Force highlights the problems perceived by a community already too experienced with the negative impacts of major new construction projects and related new development.

The Commonwealth is aware of the serious nature of potential construction period impacts on North End residents and merchants, and shares the concerns of this community. These impacts and possible mitigation measures have been initially addressed in Sections 4.4.3 Preferred Alternative (re land use impacts), 4.5.3 Preferred Alternative (re community and neighborhood facilities), and 4.6.4 Impacts on Subarea Economics. Concerns of rodent control, groundwater level changes, etc., are discussed in Section 4.1 DESCRIPTION OF CONSTRUCTION. Other concerns, such as air quality (dust) impacts, construction noise, etc., are discussed in relevant sections of the FEIS/FEIR. Mitigating measures include barrier walls to reduce noise, dust control methods, and groundwater table monitoring with the use of well points to pump or recharge the groundwater table, as necessary. Rodents will be controlled according to the methods described in Section 4.1 of the FEIS/FEIR, and also in the MDPW's Manual on Standard Specifications for the construction of highways and bridges; these methods will be in accordance with the health rules and regulations of the City of Boston and State health departments. The Commonwealth is also committed to a restriction of heavy construction vehicles on local streets; heavy construction vehicles will be restricted to a construction road under the existing Artery with connection to the regional highway networks. Displaced under-Artery and publicly-owned parking lot spaces will be replaced prior to their being unavailable by construction by the project (under the Central Artery in Financial District, Waterfront, North End). During construction, street circulation changes will be made to discourage commuter traffic in the neighborhood.

The Commonwealth is committed to further environmental documentation of construction impacts during the design phase as a way of resolving the potential construction period problems. Legal guarantees regarding the use of these measures can be made in the form of specifications to construction documents and contracts. State and City mechanisms to help local businesses affected by the construction are also being explored. The Commonwealth agrees that community residents should play a major role in determining the use of the new parcels of land created above the depressed Central Artery. A planning process including members of the community will be initiated as soon as the project is approved (see Section 4.4 Joint Development for a discussion of this process); the Commonwealth will continue meeting with representatives of the North End to solicit ideas on the structure of this participation process and to help define mitigating measures more precisely.



BOSTON TYPOGRAFICAL UNION No. 13

234 WASHINGTON STREET 120 OLD SOUTH BUILDING BOSTON, MASS 02108
431-3442

August 8, 1983

Dear Sir:

The Boston Typographical Union is planning to oppose the construction of a third harbor tunnel. Although our brothers and sisters of the state AFL-CIO, and the Building Trades Unions have endorsed this project. We must voice our opposition. As union members we must state our solidarity with the community where we live, and those opposed to the proposed tunnel.

Boston needs a solution to the complex regional

transportation problem that reaches beyond the needs of a single purpose tunnel. The transit alternatives to a tunnel would employ more laborers, carpenters, electricians, plumbers and pipe fitters, structural metal workers, tool makers, metal working assemblers, and plasterers.

Transit rehabilitation would make the greatest use of resident construction labor force. Improving mass transit should be the highest priority of the Dukakis administration. The availability of employment for many people depends not only

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BOSTON TYPOGRAFICAL UNION No. 13

on whether there are jobs to be had, but on whether workers can commute to potential workplaces. The very old and the very young who cannot operate automobiles, the very poor who cannot afford them depend on public transit. For others who can choose how they travel, the speed, comfort and convenience of public transit helps them decide how to get to work, where to work and where to spend.

Because of the complexity of underwater tunnel construction, much of the prefabrication of material will be outside of the region, and the labor necessary to assemble/construct it will also be from out-of-state.

Ultimately the needs for maintenance, and repair of roads would require fewer workers than compared to the long-term repair and rehabilitation of public transit.

For those reasons and those also stated by other members of the Coalition Against the Tunnel. We stand opposed to the third harbor crossing. Any consideration of a tunnel should review overall long-term economic impacts which have not yet been addressed. This report will be submitted to the board for adoption.

Sincerely,

Samuel DePaulo
Appointed Representative
of the BTU Local 13

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708. See Sections 1.3 and 4.2 for a discussion of mass transit and its relationship to this project.

709. The job generation potential of this project, locally and regionally, is addressed in Section 4.6.2 Impacts on the Regional Economy. No analysis was performed of the job generation potential of a series of smaller projects. Fabrication of tunnel sections will be evaluated further during the preliminary design phase; in-state fabrication sites, as well as out-of-state sites, will be considered.

The Commonwealth will continue to promote mass transit independently of the project. Additionally, the Preferred Alternative reflects this major policy commitment of making public transportation work in the Boston region. For example, included in the Preferred Alternative are highway facilities which will make possible an ambitious program to provide for a downtown/airport shuttle bus system in conjunction with the South Station Transportation Center. The project will also provide a new "bus-highway" from the proposed South Shore highway improvements directly into the South Station complex. See Section 1.3 MAJOR POLICY ISSUES for a more detailed discussion of these issues. Other transit projects are also being implemented in the region, and in the City, as indicated in Section 3.1.4 Other Transportation Facilities.

8 August 1983

TO: FHWA

Mr. James A. Walsh
Division Administrator
55 Broadway, 10th Floor
Cambridge, MA 02142

and

MDPW

Mr. Robert J. McDonagh, P.E.
Chief Engineer
100 Masbua Street
Boston, MA 02114

Re: Third Harbor Tunnel, Interstate 90/Central Artery/
Interstate 93, Boston, Massachusetts
Comments on MEPA-DOEA No. 4325 Resubmitted

FROM:

COALITION AGAINST A THIRD HARBOR TUNNEL
36 Franklin Street
Boston, Massachusetts

Dear Sirs,

We have reviewed the DEIS/DEIR and the SDEIS/SDEIR and within the very short review period we have prepared a series of comments for your review in accordance with the requirements of the Massachusetts Public Access to Information Act (MIPA) DOEA No. 4325 and hereby submit them for consideration and response.

Basically, our position is that the Coalition Against a Third Tunnel (CAT) opposes the construction of any third harbor tunnel because the coalition believes any new crossing would encourage the uncontrolled growth of Logan Airport and airport-related services and facilities. The construction of a third harbor tunnel would discourage the use of public transportation, increase the use of private cars, and delay alternative projects to ease congestion in the existing tunnels.

Furthermore, the coalition is convinced that the state has not adequately evaluated many potential environmental, social, and economic problems associated with the construction of a third harbor tunnel. We believe the one billion dollar price tag on a third harbor tunnel is too much to spend for a traffic problem. Boston needs a solution to a complex regional transportation problem that reaches far beyond the needs addressed by a single purpose harbor tunnel.

Many people endorse a third tunnel without fully understanding the tremendous effects on the environment, the social fabric and the local economy during and after construction. The following comments are intended to educate the public and to inform the transportation studies and policies have contributed to the popular misconception that Boston is in dire need of a third tunnel.

The coalition proposes the following alternatives to a third tunnel, and we urge the state to explore these and the other options thoroughly before considering plans for any future harbor crossing:

- *Improved central artery and access to existing tunnel traffic;

- *Permanent one-way toll system;

- *Improved public transit and incentives to use it;

- *Extensive ferry network; and,

- *Cap on Logan Airport growth.

However, in the spirit of cooperation, the CAT, as stated in other papers, has continued to work with the State Administration in order to improve on today's transportation problems. It is in this spirit that these comments are submitted.

We have divided our initial comments in a series of ways, both by alignments for the tunnel and by categories for the generic comments as they relate to the total study and not to specific alternatives or alignments.

The comments are as follows:

General Comments:

1. Any tunnel alignment to East Boston (Airport, Jeffries Cove or Conall) would be a stimulus for airport growth. This growth would cause further encroachment of airport-related industries into the East Boston community. The additional traffic generated by another tunnel would also have an adverse impact on our neighborhood streets. In addition, already overburdened vehicles (i.e., air conditioned trucks, car rentals, shuttle vans and buses, taxis and airport customers).
2. A tunnel connection to C1 is shifting congestion further north to Ball Circle, Revere. This would make a future connection to Route 95 inevitable.
3. The tunnel fabrication site in Lynn as described will adversely impact wetlands affecting mussel flats, fish and water fowl. This should be addressed more seriously and in depth.
4. Any new tunnel would encourage people to use cars rather than Mass. Transportation. A regional transportation system must be developed and a well-balanced system which will not remove users from mass transit.
5. What is the content of dredged material? What route will be used to dispose of it? How will it be transported out of the work area? This was not adequately addressed and is a serious environmental issue.
6. The report is too judgmental, and makes assumptions without adequate data.
7. Not adequately addressed is water seepage during construction. Our present sewer system is antiquated and is not adequate to accommodate much more.
A concern that was raised and not addressed was that 10,000 gallons of sanitary sewage will be disposed of through on-site systems and through public sewerage systems.
8. Another concern that was raised and not addressed is the use, storage, and disposal of hazardous materials during construction which include explosives and oil-based materials.
9. All traffic studies were conducted prior to the implementation of one-way tolls. This needs to be restudied based on the one-way toll system now in effect.
10. It was stated that there will be an increase in the "p" ridership during construction. Can this be verified? Are there additional people? Has this been reviewed and studied?

11. Expanding Mass. Transit should be considered to determine whether it would provide more permanent jobs than construction jobs for the immediate area. (Boston and Region)
12. It is stated that there would be displacement of over 3,000 employees due to taking of buildings. Local relocation of these employees is a critical issue. Employment in the area is critical. Has relocation been studied?
13. The cost and amount of energy for lighting and ventilation are not adequately addressed and this will be a continued burden for the Commonwealth taxpayer.
14. Where does the excess material from the Artery and Tunnel go for disposal? It is stated that some will be removed by truck on roads connecting to Route 1A. This is not adequately addressed. Route 1A to where? Much more must be included.
15. If alternative 6 is Depressed Central Artery ONLY (no new tunnel), why are provisions made for connections to and from the existing Harbor Crossing in both the Port of Boston and in the vicinity of South Bay? (p. 17 - Supplemental)
16. Alternative 1, which addresses impacts of redecking of the Central Artery, did not include improvements to the approaches of the existing Callahan/Sumner Tunnels and improvements to Cross Street.
17. A two-lane tunnel to the airport should be fully addressed in the Final EIS/EIR.
18. There should be an increase in the tolls at the Callahan/Sumner Tunnels to provide for a free annual sticker program for East Boston residents. The sale of tokens rather than the sale of stickers to relieve toll booth congestion. This should be investigated to determine the effect on traffic.
19. Give MBTA users to Logan Airport incentives for using Mass. Transportation (trains and buses designed for baggage and passengers in mind).

- Alternatives 2: Westerly Tunnel with Central Artery
 Improvements (Railroad Alignment)
 4: Westerly Tunnel without Central Artery
 Improvements (Railroad Alignment)

It is our understanding that Alternatives 2 and 4 are rejected and that further evaluation of a railroad alignment for a tunnel is not warranted (p. 32, Appendix 1 Scoping Record). Since they are carried forward in the EIR, we feel it necessary to list some brief comments:

1. A railroad alignment would "split" our community in two.
2. It would be inevitable to use our neighborhoods for additional airport use. The businesses that would be forced to vacate due to the construction of the tunnel would need to relocate.
3. Potential for changing land use from residential to accommodate displaced businesses would adversely effect the residential quality of both the Jeffries Point and Mt. Carmel neighborhoods.
4. During the construction period the Mt. Carmel area would have minor economic benefits. Mental and physical stress would be placed on residents.
5. A proposed staging area on the East Boston Piers would have severe impacts on the elderly and handicapped in close proximity: Heritage Apartments, Victory Gardens Apartments and Landfall East Apartments. (Immigration Station 27 Marginal Street. This elderly housing was never mentioned in the report).
6. The vent emissions would adversely effect these same elderly and handicapped and many other residents with heart and respiratory diseases.
7. Traffic would be increased on our local streets during construction.
8. The potential development of the East Boston Piers 1-4 would depreciate.
9. The potential use of Fort Point Channel would also depreciate.
10. Structural impacts to buildings from pile driving not adequately addressed.
11. Several local businesses affected negatively.
12. There would be a devaluation of property resulting in tax losses to homeowners. Loss of equity and rental income not adequately addressed.

13. Visual aesthetics would be destroyed.
14. There would be significant environmental impacts not discussed.
15. There would be an impact on the access to the East Boston Memorial Stadium during construction and after.
16. East Boston's major Fire House on Sumner St. would be working under severe hardship for 3-5 years.
17. No realistic plan is presented for building bridges over the tunnel construction and completed tunnel.
18. These alternatives are in the floodplain since the alignment is at sea level.
19. The air quality at the E.B. Memorial Stadium would be further degraded.
20. The vibration impacts to the MBTA Red and Blue Lines not adequately addressed.
21. This is the most destructive alignment during and after construction to the local area.
22. No inventory was presented of the children using the local streets and bridges going to and from neighborhood schools (Dante Alighieri on Gove St. and Samuel Adams on Webster St.) one parochial school (East Boston Central Catholic on Havre St.) and one magnet school (Dana Hall on Cottage St.). These are all elementary schools.
23. Water seepage during construction into local antiquated sewers not addressed.
24. Short and long term reduction in the quality of life has not been assessed.

- Alternatives 3: Third Harbor Tunnel from Fort Point
 5: Channel to Jeffries Cove/Airport Alignment
 3A: Central Artery Depression with Third Harbor Tunnel via Fort Point Channel

1. During the construction of a Jeffries Cove Alignment, Porzio Park and the adjacent Jeffries Cove, in Boston, will be adversely impacted. The Yacht club will be idle for too long in all likelihood forcing it to go out of business. This is the oldest chartered yacht club on the East Coast. The construction of the proposed Bird Island Flats Park would probably be delayed or hindered in its development. If developed, access from the construction neighborhood will be discontinued during the construction period of 3 - 5 years.
2. East Boston Memorial Stadium, protected by Section 4(f), will be decimated by the construction period and some land would be taken. The Stadium land was transferred to the City of Boston. Parks and Recreation Department in 1954 by the Commonwealth of Massachusetts in exchange for the city-owned recreational facilities located in the Woodlawn Park (near Fort Airport Postal operations). This was required for airport expansion. The Stadium represents more than 50% of East Boston's recreational facilities. Some of the activities at the Stadium are: track, tennis, football, baseball, basketball, Tot Lot. Users of the Stadium include: mentally retarded groups, Neighborhood Soccer Team, "Ball" game, Bowlers, APAC Day Camp and for general recreation. What accommodations will be made to accommodate the uses and the users?

Following construction the users of the Stadium will be exposed to an increase in impacts on the ambient environment already heavily impacted from the numerous transportation facilities located in the Stadium. Has the air quality been addressed adequately at this location?

3. The vent structure proposed at the end of Maverick Street has serious negative environmental impacts especially on the elderly and the residential community.
4. The toll plaza, adjacent to the vent structure, generates and concentrates pollutants creating another "hot spot".
5. The new traffic from a four-lane tunnel emptying into the Airport roadway hasn't been adequately addressed. It cannot "dis" on the Airport, and will inevitably lead to additional road construction to tie into C-1.
6. Fort Point Channel would be adversely impacted by a tunnel. The tunnel would be a physical barrier to the Channel. While other cities in the world are creating man-made channels, we are destroying a natural beauty.

7. In many areas there may be structural damage to property during construction. How will this be addressed in the Final EIR/EIS? How much money will be set aside to compensate for these damages? How will damages be assessed?
8. The impact on Gillette Company could be significant due to construction vibration and water use.
9. The MTA is not adequately addressed under these alternatives. No allowance is made for an extension of the Blue line to the Airport terminals or access during construction.
10. How will the Blue Line be affected during construction?
11. Not adequately addressed were the impacts on the water quality of Jeffries Cove during and following construction.

Alternative 5A: Third Harbor Tunnel from South Boston "Seaport Access Alignment" to Jeffries Cove/Airport plus Depressed Central Artery

1. It is stated that there will be an additional 17,000 cross harbor trips per day but traffic impacts in East Boston not discussed.
2. Toll increase is inevitable. It is stated that tolls may be subsidized by the State. It's not realistic to believe that the State will subsidize the motorists.
3. By implementing a higher toll for the Third Harbor Crossing, traffic will continue on to the Callahan/Summer Tunnels.
4. If there is a decrease in the use of the Callahan/Summer tunnels there will be a loss in revenue to the existing tunnels, which are bonded.
5. Following construction of a Third Harbor Crossing, it is stated that there will be a loss of "T" ridership and a loss of Mystic-Tobin Bridge users. The foregone conclusion is that we are enticing people to use private cars rather than Public Transportation.

Alternative 5A: Design Modification

1. The "Summary of Significant Environmental Impacts" chart does not have this alternative listed.

2. Data not covered:

Air Quality
Noise and Vibration
Traffic Impacts
Water Resources
Land-Use and Economic Impacts
Dredge Material Disposal
Historic Resources Report
Public Participation
Archaeological Survey Report

Questions:

- a. When will these be addressed?
 - b. In what form will they be?
3. The temporary relocation of Eastern Air Lines' Satellite Gate facility to Logan Airport, which construction phasing must be addressed in the FEIS/PEIS.
Will a separate study be required to access the impacts?
Will temporary become permanent?

4. This alternative may be impossible to construct due to the following reasons:

- a. A 4-1/2 year construction period from water's edge to the terminal.
 - b. High dust accumulation on aircraft engines. The lives of the flying public would be at stake because of probable engine malfunction or dust on critical control surfaces and equipment.
 - c. Working hours would be severely curtailed due to safety issues.
 - d. What process will be used to control dust?
 - e. Will harmful substances be used in the process?
5. The negative impacts on the proposed development of the Massachusetts Technology Center on Bird Island Flats must be fully addressed and mitigated.
 6. Is this a new alternative or another alignment within an alternative?

7. Traffic analysis indicates that through at least 2010 there is no need for more than one lane in each direction yet a four-lane is the preferred design. Four lanes invited diverted traffic and induces more traffic over the long run.

8. Present design calls for direct access on the East Boston side to Route 1A. This traffic diversion (from Tobin Bridge to Tunnele) is undesirable for residents of this traffic corridor. Moreover Rt. 1A is inadequate in design to handle local traffic, present tunnel traffic, and a third tunnel's traffic. The inevitable is massive congestion on Rt. 1A in East Boston and the surrounding areas. The undesirable and unexpected consequences seem to be the changing of Rt. 1A to Interstate design.

9. At present, East Boston suffers from three very harmful impacts of Logan Airport and the existing tunnels:

- a. Airport traffic uses local streets to avoid queues, putting the health and safety of our residents in jeopardy.
- b. Because of easy access to our neighborhoods, many businesses - especially parking lots, rent-a-cars and freight forwarders have begun to refrain from locating on Logan and are now in our neighborhoods.
- c. Daily commuters from the northern suburbs also use our local streets in an effort to avoid the queues on Rt. 1A.

The study did not include a review of:

1. The closure of Porter and Maverick Sts. to Logan Airport.
2. Relocation of airport-related business onto the Airport.
3. The re-use of East Boston land from which those businesses will relocate in a manner which is compatible with and improves our neighborhoods.
4. A solution to our Day Squeeze truck traffic problem (Rt. 1A and Chelsea connectors).
5. The elimination of the opportunity for non-East Boston oriented traffic to use East Boston Streets.
10. We see no evidence of analysis of the location of the vent stack. We are unable at this point to determine how damaging the emissions will be.
11. Especially through the design of hook-ups to Rt. 1A, East Boston Stadium may have 4P impacts and certainly will have more traffic circulating around it.
12. It has been stated that tunnel construction will begin before the Depressed Artery construction. This leads to a 5+ year period of construction. The mitigating tunnels would be in place before the Depressed Central Artery -- UNACCEPTABLE. The effects of this construction phase have not been studied.

Public Participation/Information

1. Considering the scope and potential impact of this project, holding only two working committee meetings since the addition of the new alternative seems too few to address the impacts, concerns and issues.
 - a. Is there a listing of other meetings?
 - b. What other meetings will be held?
 - c. How will updated timely information be disseminated?
2. The information presented in the Supplemental Draft EIS/EIR is too difficult to understand in order to make rational choices.
3. The information is too technical for this stage of the process.
4. The study is not readable in the total package as it has not been adequately coordinated.
5. There was an inadequate number of copies of the Supplement distributed. Some copies were received two weeks prior to their Public Hearing. Did this provide enough time to adequately review the material? This report is as you know two sets of 300 page books as well as seven appendices and four supportive reports.
6. The technical information is confusing to lay people and some knowledgeable technicians.

Water Quality

1. The tunnels of the Central Artery, South Boston Seaport Access Road and Third Harbor Crossing shall require cleaning from time to time. The cleaning shall be done by placing the silt into the water. The silt shall be washed down and conceivably be put into the sewer/drainage system which in time will affect our water quality. The methods of cleaning and disposal of residue should be addressed in all three tunnel locations.
2. The new alignments of 5A and 5A modified should be tested and confirmed relative to harbor sediment and impact on water quality.
3. As stated, dredging will take place over two years since 250 working days are required and work will not proceed during flounder spawning season between February 1 and May 15. Are other forms of marine life affected by this two year operation (shellfish, starfish, etc) due to the change in the water quality?
4. What are comments from Fish and Wildlife Service on the 5A modified alternative?

Land Use/Economics

1. This aspect has not been studied in depth.
2. There must be more business input from the immediate areas of construction.
 - a. There will be approximately twelve years of construction spread over several areas, for what return to the businesses?
 - b. Who will compensate for their losses during construction?
 - c. There will be potential for development of new developable land (air rights). This land could be turned over to the City for tax return uses.
Some process must be implemented for interested community people to participate in providing input and in the decision-making process.
4. Several Section 4(f) properties are impacted:
 - a) Paul Revere Landing Park in the North Station area.
 - b) Charles River Reservation and others.
 - c) Fort Point Channel.
There will be some permanent takings and some temporary construction easements.
All possible mitigating measures must be explored to minimize harm. A process must be implemented to allow affected communities to participate in designing the finished product.

Traffic

1. South End/Herald Street/East Berkeley Street not adequately addressed.
2. Will parking be replaced in Downtown/North End areas during and following construction?
3. What accommodations will be made for losses of parking spaces during construction? Will shuttle service be implemented?
4. Is a Storrow Drive connector included in assumptions? (i.e., Route 1 from Mystic-Tobin Bridge to Storrow Drive)
5. Who approves or prohibits use of tunnels as hazardous cargo vehicle routes? Has application been made for use of these routes?
6. How will hazardous cargo traffic be handled on local surface streets?
7. What are the impacts if a Third Harbor Crossing were built after the Depreciation of the Central Artery?
8. The New Surface Artery has not been adequately addressed, as it will become a new Artery rather than a local street. It is shown as a one-way street in each direction, which is NOT a local street.

Air Quality/Ventilation Structures

1. Location of vent structures is questionable and must be investigated further.
2. Cleaning is not adequately addressed. This equipment shall have emissions of pollutants and will require careful and controlled cleaning. How will this be monitored and by whom?
3. All measurements of CO and NO₂ were taken under ideal design conditions. It is stated that if there is a malfunctioning of the ventilation fans there should be a health hazard. Could this be a health hazard? The procedures recommended to maintain the vent system must be followed. not "should be" (p. 218 - SDEIS/c)
4. How is "acceptable" defined? (p. 218-SDEIS/R)
 - a. Is this a Federal guideline?
 - b. Is "acceptable" the minimum standard?
If so, we cannot accept "acceptable" because then the minimum becomes the maximum.

Visual/Aesthetic Impacts

1. The study makes judgements that areas would be better knitted together visually. These decisions should be made by the affected communities; i.e., the North End - they may feel more protected by the "walls".
2. How do the proposed new level bridges look from the Charlestown and Beacon Hill neighborhoods?
The shadowing effect reduces the aesthetic quality of the pedestrian walkway and the public recreation value of the area.
What is the visual effect across the Charles River?
3. Not adequately addressed are the adverse impacts of these bridges on the existing and proposed NDC park facilities along the Charles River
4. The Ft. Point Channel is visually affected by all alternatives and must be addressed.
5. The vent buildings need serious study before the design stage to investigate alternative forms and/or solutions.

Conclusion

In the year 2020 will we see three congested tunnels, more traffic on our local streets, more airport uses in our neighborhoods and a cry for a fourth tunnel to relieve that situation?

In general, we hope that these brief comments can be responded to in a satisfactory and timely fashion. As described in the report, we shall make any additional comments known prior to the August 22, 1983 deadline.

We also hope you will improve public participation at all levels in state transportation planning so citizens may play an active role in final transportation policy decisions which potentially affect the quality of life and the use of public funds.

Sincerely,

COALITION AGAINST A THIRD HARBOR TUNNEL
16 Franklin Street
Boston, Massachusetts

RESPONSE TO COMMENTS BY CATT

See responses to previous written comments by CATT.

COALITION AGAINST A THIRD TUNNEL

Position Statement

The Coalition Against A Third Tunnel (CATT) opposes the construction of any third harbor tunnel because the coalition believes any new crossing would encourage the uncontrolled growth of Logan Airport and airport-related services and traffic into surrounding residential communities. A new tunnel would discourage the use and development of public transportation, increase the use of private cars, and delay alternative projects to ease congestion in the existing tunnel.

Furthermore, the coalition is convinced that the state has not adequately evaluated many potential environmental, local and economic problems a third harbor tunnel would create, and has ignored many inexpensive alternative transportation solutions. We believe the one billion dollar price tag on a third harbor tunnel is too much to spend for a traffic problem. Boston needs a solution to a complex regional transportation problem that reaches far beyond the needs addressed by a single purpose harbor tunnel.

Many people endorse a third tunnel without fully understanding the tremendous effects on the environment, the social fabric and the local economy during and after construction. We believe that inadequate transportation studies and policies have contributed to the popular misconception that Boston is in dire need of a third tunnel.

The coalition proposes the following alternatives to a third tunnel, and we urge the state to explore these and other solutions thoroughly before considering plans for any future harbor crossing:

- Improved central artery and access to existing tunnel traffic;
- Permanent one-way toll system;
- Improved public transit and incentives to use it;
- Extensive ferry network; and
- Cap on Logan Airport growth.

Members of the Coalition Against A Third Tunnel include:

Full Members

Former Lieutenant Governor Thomas P. O'Neill III
 Eric S. Lipton
 State Representative Edward Markey
 Boston City Councilor Ray Flynn
 Boston City Councilor Frederick Langone
 Cambridge City Councilor David Sullivan
 Suffolk County Sheriff Dennis Kennedy
 Governor Michael Dukakis
 Massachusetts Department of Transportation
 East Boston Area Planning Action Council (APAC)
 East Boston Fair Share and Massachusetts Fair Share
 East Boston Concerned Citizens for Public Safety
 East Boston Harborside Community School
 Gove Street Citizens Committee
 Jeffries Point Harborside Neighborhood Association
 East Boston Land Use Advisory Council
 Massachusetts League of Women Voters

Supporters

US Senator Edward M. Kennedy
 US Senator Paul Tsongas
 US Representative Thomas P. (Tip) O'Neill
 US Representative Edward Markey
 Boston Mayor Kevin H. White
 Former Joint Transportation Planning Council Chair Alex Tait
 Bay View Associates
 Green Heights Improvement Organization

ALTERNATIVES

IMPROVEMENT OF THE CENTRAL ARTERY

In Boston traffic congestion occurs because too many vehicles are using an inadequate and poorly designed highway system as the main north-south artery. The central artery should be recognized as the prime cause of the traffic congestion, and not the tunnels. There are numerous merges on the artery, like the bottlenecks where Myrtle Bridge traffic merges with I-93 traffic, which prevent traffic from moving smoothly, and limit full capacity use of the bridge and tunnels. Back-ups into the Summer Tunnel occur because vehicles are forced to stop for pedestrians and delivery trucks crossing tunnel traffic.

to get to and from the North End. Cars and trucks parked and double-parked at the North End bus-terminus in the area further stall traffic. Exit ramps that were separated from the main highway by a median-train crossover would not only make traffic flow more smoothly, but also greatly increase safety. The artery itself has many weaknesses. It can no longer be integrated with local streets safely or effectively. The artery demands immediate attention and extensive improvements.

PERMANENT ONE-WAY TOLLS

About ten thousand vehicles pass through the Callahan Tunnel each day during rush hour. About 40 per cent of these vehicles are trucks. The toll on the tunnel, the Port Mass. Port Authority Mass. Turnpike, and the I-93 toll have been in place since 1970, but toll revenue has not been used to improve the tunnel, but instead only in 1983 has cut minutes off the travel time to the airport, and has made the north-south commute much less painful. Permanent one-way tolls have been extremely successful in many other major cities. California, New York and New Jersey have all reduced congestion on their tunnel and bridge networks and have seen significant improvements in traffic flow and management. The state should make the Boston one-way toll experiment permanent immediately.

IMPROVED PUBLIC TRANSPORTATION

Public transit improvements must make it easier for travelers with luggage to move to and from Logan Airport. A Blue Line spur into the airport is one obvious solution that would eliminate the existing transfer from train to bus and the waiting and luggage-lugging problems. Trains running on the spur could have dedicated space for luggage. Only 6 per cent of Logan travelers now get to the airport on the Blue Line and the airport bus. This figure might be boosted substantially with better access to the airport tailored to the needs of travelers using the line. The tremendous advantage of having a direct, low-cost shuttle from Boston to the airport would far outweigh the relatively low construction costs of building a spur to a functioning line and would eliminate the need for the Massport bus. Connecting the Red Line to the Blue Line at Court Street and expanding the Blue Line north to Lynn would also make it easier for passengers to the west, north and south of Boston to get to the airport.

The state should also expand satellite parking areas near major highways like I-93, I-95, I-495 and I-90. These areas would help solve both a traffic problem and a parking problem in the Boston area. If the state actively publicizes the lots, encourages their use, and clearly marks them on the highways, many more commuters will know about them and use them. Special airport shuttles could accommodate luggage. The success of satellite lots in cities as nearby as Hartford, Connecticut proves that people will keep their cars out of a congested city if there are incentives.

EXTENSIVE FERRY NETWORK

While the city's waterfront development is accelerating, the tremendous public transportation possibilities of the harbor have been largely ignored. Several private waterfront developers have realized the importance of the harbor and have begun to develop the waterfront. The state could encourage ferry service by linking docks in their plans for the future. Massport and the state could encourage ferry service by linking the \$134 million Bird Island Flaga development at the airport with Massport's \$125 million project at Commonwealth Pier by water. Ferries could easily handle the projected hundreds of thousands of yearly visitors and would add a distinctive, functional dimension to the accessibility of both projects.

Shuttle ferries to the airport could be only a single component in an extensive harbor ferry network to accommodate commuters from the north and south. The network could also serve the airport and the city's waterfront. The network could fill out the network and link Boston's waterfront neighborhoods. The network could also serve the airport and the city's waterfront. The network could also serve the airport and the city's waterfront.

Special boats could link the ferry system with existing MBTA lines and the airport. Express buses with luggage carriers could take travelers from North and South Stations and central MBTA stops directly to the ferry terminals for the airport. An extensive public ferry network linked to existing and expanded public transit lines would be a serious creative solution to some of Boston's transportation problems.



THE COMMONWEALTH OF MASSACHUSETTS

METROPOLITAN DISTRICT COMMISSION
20 SOMERSET STREET, BOSTON 02108

PUBLIC INFORMATION OFFICE
727-5215

CONTACT: Cheryl Yaffe
727-5215

FOR IMMEDIATE RELEASE
9 August 1983

METROPOLITAN DISTRICT COMMISSIONER WILLIAM J. GEARY TODAY TESTIFIED IN
SUPPORT OF THE DEPRESSION OF THE CENTRAL ARTERY AND THE THIRD HARBOR TUNNEL

Metropolitan District Commissioner William J. Geary today testified in strong support of the depression of the Central Artery and the third harbor crossing. The Metropolitan District Commission is the agency with the primary responsibility for police and emergency services on the Central Artery, as well as the agency responsible for the preservation, protection and enhancement of the region's parks and open spaces. Commissioner Geary focused on the issues of public safety and environmental improvement.

The Central Artery is Boston's major North - South Connector as well as a major route to Logan Airport. It is the region's most important transportation facility and the region's number one traffic congestion problem. At present the Artery is far exceeding its capacity, with 160,000 cars per day using the road and traffic projections of a ten percent increase over the next twenty years. This aging and overburdened structure will have to be rebuilt or replaced within the next ten years in order to keep the route operational.

- more -

- 2 -

The Central Artery now experiences 2 1/4 times the national accident rate for urban highways. In 1981 Metropolitan District Commission Statistics indicated a total of 682 accidents in the area from the City Square on-ramp through the Devey Square Tunnel; 1982 resulted in similar statistics. Ninety percent of these accidents involved personal injury.

The enormous congestion and hazardous design of this short stretch of road is the reason for the alarming amount of accidents. The many access ramps merge on to a highway that has inadequate deceleration and acceleration lanes and no breakdown lanes.

Commissioner Geary explained the role of the Metropolitan District Commission Division of Central Services, which provides motorist aid, emergency services and unique capabilities to handle critical accident situations. The Commissioner showed dramatic photographs of serious truck accidents along the Artery responded to by Metropolitan Police and the Metropolitan District Commission Central Services Special Emergency Operations Unit. He estimated that this unit responds to similar accidents on this stretch of road 55 times a year. Also, the Division's Notorist Aid Patrol, which operates daily, assists thousands of disabled vehicles per year.

The public safety concerns when the Central Artery is jammed from 6 a.m. to 8 p.m. as projected in the Environmental Impact Statement is startling. As it is now, there is grave concern in this city for the ability of emergency vehicles to get through city streets.

Commissioner Geary stated, "It is the Metropolitan District Commission's opinion that a depressed and widened Central Artery will provide the citizens of this city and this region with a safer and more efficient highway system. As the agency responsible for policing the Central Artery during construction, it is our judgement that mere reconstruction of the artery will not remove the causes of the many accidents."

- more -

Commissioner Geary emphasized that one of his agency's strongest mandates is to preserve, enhance and develop the urban park characteristics within the Metropolitan area.

The depression of the Central Artery will eliminate the horrendous elevated structure which for years has been the dark cloud over Boston's streets as well as an obstruction to the city's historic waterfront area.

The Metropolitan District Commission will be working in cooperation with the Department of Public Works on design improvement for the proposed twin bridges over the Charles River Dam.

Commissioner Geary said, "In conclusion, it is my hope that the Metropolitan District Commission can work with state and federal agencies to not only provide the region with a safer transportation system, but also improve and enhance the environment and livability of the city."

No response necessary.

Statement of Joseph E. Mullaney
The Gillette Company
Re: Proposed Third Harbor Tunnel and
Seaport Access Road

Since 1904, when The Gillette Company first began to manufacture razors and blades at its present location in South Boston, the Company has been a strong and contributing member of the Boston community. Nearly sixty per cent of all razor blades sold in the United States are produced in that location. Today, the Company's facility in South Boston employs about 3,000 of our 4,200 Boston employees, many of them residents of the City of Boston. The annual payroll of the Company for the South Boston facility is approximately \$65 million.

We would like to make it clear that Gillette favors transportation projects which would alleviate the problems associated with travelling in and around the city of Boston. Gillette is not opposed to widening and depressing the Central Artery. Nor is it opposed to a seaport access road or a third harbor tunnel. Gillette is opposed, however, to transportation proposals which will damage the Fort Point Channel and threaten Gillette's operations in South Boston.

We believe that the construction proposals in the Draft Environmental Impact Statement will cause such damage, both to the Channel and to Gillette's operations. Our major concerns are as follows:

In general --

- o. The overall impact on the development potential of the Fort Point Channel

-2-

As related to Gillette specifically our concerns are:

- o. Water displacement
- o. Disruption of operations due to vibrations
- o. Disruption of operations due to interrupted access to the facility
- o. Effect on expansion plans
- o. Loss of storage tank capacity

First, the project's impact on the potential of the Channel.

On May 31st, a Boston Globe editorial entitled "Boston's Valuable Channel," noted that the "vitality and the visual interest of the Fort Point Channel has already "sparked the imagination of developers ... and lured prime commercial and residential tenants to the area." The loss of the Fort Point Channel, as it exists today, would be deeply felt by Gillette. But, it would be a tragedy for Boston.

Second, water displacement. Since 1926, Gillette has made extensive use of the water in the Fort Point Channel to operate its cooling and power equipment. Current operations have been using approximately 39 million gallons a day. At full capacity, the system is designed to use 58 million gallons of water a day. This water must be of the proper temperature and quality. Without this water we cannot operate in South Boston.

If a tunnel, depressed artery or seaport access road is constructed in the Channel, Gillette would be deprived of a sufficient water supply of proper temperature and quality, rendering the equipment that depends on this water inoperable.

It has been suggested in the Draft Environmental Impact Statement that Gillette's existing water intake pipe be extended from its present location all the way into Boston Harbor. This is unacceptable from an operational standpoint.

The additional costs of pumping, cleaning, and maintaining a pipe seven times the length of our present pipe would be substantial. Questions of ownership of the pipes and the sea bed on which they would rest, would require resolution. Further, issues of access and safety must be addressed.

Third is the matter of vibration. Under any of the proposed alternatives, the construction will cause vibrations which may upset the use of precision inspection and manufacturing equipment at Gillette's facility. Some of our procedures demand tolerances to within five ten-thousandths of an inch. In addition, under Alternative 5A, the permanent traffic flow would cause continuing vibration problems.

Our fourth concern is the disruption of our operations due to restricted access to the facility for employees, suppliers, visitors and trucking, a disruption that would last for the long period of construction, and in some cases, permanently.

Fifth is the concern that we have about the impact on future expansion plans for the Fort Point Channel and the Company. The potential for the Fort Point Channel for business and recreational development has been recognized for years and the current proposals would hinder those options. Likewise for Gillette, any options of further development on the Company's current site would be severely limited.

Finally, under Alternative 5A, Gillette's large underground storage tanks at the South Boston facility, which are vital to its operations, are located on the land proposed to be taken. Whether there is a suitable alternative site for these tanks has not been determined.

In conclusion, let me reiterate that Gillette is in favor of improvement to traffic problems in and around the Boston area and improved access to the seaport and the airport. It is, however, our firm belief that any construction associated with a relocated or depressed artery, a seaport access road or a third harbor tunnel should not have serious negative impacts on the Fort Point Channel or Gillette.

-5-

Gillette, at considerable expense, has developed alternative proposals to the environmental impact statement and has submitted them to Transportation Secretary Salvucci. He has responded with some interest to those proposals and has indicated, if technically feasible, they would be included in the final environmental impact statement to be submitted to the Federal government.

While the proposals we have submitted do not resolve all of the Company's concerns with the proposed projects, they will, to a large extent, mitigate the adverse effects on the Fort Point Channel and on Gillette.

Dr. Poulos of GeoTech Engineers, Inc., will provide you with the details of the proposals from Gillette.

Thank you.

See responses to written comments
by the Gillette Co.

STATEMENT BY

MARTIN W. MILLER, P.E.
145 Pinckney Street
Boston, Massachusetts 02114

August 9, 1983

Good Morning:

I appear before you today in two separate roles: First, as Chairman of the Joint Regional Transportation Committee (JRTC), and second, as a concerned Transportation Engineer.

The JRTC is a Federally-mandated body whose 58 members represent the following: The six (6) signatories of the Metropolitan Planning Organization (MPO), twenty (20) cities/towns, twelve (12) public agencies, and twenty (20) citizen groups. The JRTC's function is to advise the MPO on transportation policies for the Metropolitan Boston Area Planning District which encompasses 101 cities and towns.

As part of their responsibilities, the JRTC reviews and advises the MPO on the following Federally required documents: The Unified Planning Work Program (UPWP), the Transportation Plan which includes the previous Transportation Systems Management (TSM) Element and the Transportation Improvement Program (TIP). It is through these documents that the allocation of transportation funds are made and approved by the Federal Highway Administration (FHWA) and the Urban Mass Transportation Administration (UMTA).

For the past year, the Executive Office of Transportation and Construction has continuously cooperated with the JRTC and has kept us advised of their plans and activities. On March 23, 1983, the JRTC voted unanimously to advise the MPO to endorse an amendment to the 1983 TIP that would make Preliminary Engineering Funds available for the preparation of an Environmental Impact Statement for the Central Artery/Harbor Crossing Project.

The results of this study is now public, and a decision will soon be reached. As Chairman of the JRTC, I commend the efforts expended to date, and encourage the advancement of this most important transportation project

The one note of warning that I feel obligated to give at this point is ----- The cooperation established must continue, and the review process must be conducted in a manner that will mitigate all adverse effects and encourage a partnership between all interests.

My second statement is offered as a transportation engineer who is concerned with the bleak transportation situation with which we are presently faced. The Central Artery is the only major conduit that serves the City of Boston. It is over thirty years old and inadequate to meet the demands imposed upon it. Additionally, access to and from the Airport is not only insufficient, it is outrageous.

We have before us an opportunity to correct and improve our transportation network in a manner that will benefit all, with minimal interruption to the City, its inhabitants, and its visitors. Should we not avail ourselves of this opportunity, we will soon be faced with an impending crisis.

Boston was recently rejected as a site for a naval facility. One reason given was the poor quality of life. While I do not understand the basis for this determination, I do understand this ----- Unless something imaginative and constructive is done to improve our highway system quickly, Boston will indeed be deserving of that determination.

As a resident of Boston, and as a Transportation Engineer, I strongly endorse the concept of a Depressed Central Artery, Third Harbor Crossing and Seaport Access Road.

Thank you.

No response necessary



The New England Council, Inc.

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Testimony

of

The New England Council, Inc.

Proposed Depression of Central Artery
Proposed Third Harbor Tunnel

Tuesday, August 9, 1983

Boston, Massachusetts

My name is Eric Sider, president of The New England Council.

The Council is a privately funded association of 1,200 firms whose members collectively employ over 25 percent of the workforce in the six state area.

The Council's mission since 1925 has been to improve economic conditions for the New England region. Our focus of attention since 1978 has been on national and regional issues that impact the business climate here.

To that end we primarily work on energy, budget, tax and regulatory matters under debate in the Congress of the United States and in Federal agencies.

There are several matters, however, including management of hazardous waste and transportation issues which are of concern to our organization because of their regional economic implications.

To that end, we generally work very closely with other associations which our members support whose charter is more statewide or local in scope and who can focus greater resources at developing acceptable local solutions.

Logan Airport is an important regional facility, and over the years The New England Council has supported its growth and expansion and improved access to the facility. Like our magnificent regional resources of colleges and universities, medical facilities, financial institutions, Logan's viability is a major contributor to our current good state of economic health.

It's a gateway to the world that not only allows for an extraordinary concentration of high technology manufacturing here but also has lured firms like Wheelabrator-Frye and Congoleum to locate their international corporate headquarters in New Hampshire. As we continue to become increasingly dependent on foreign trade and exporting our products and services, Logan's accessibility continues to grow in importance.

Improving access to Logan Airport by constructing a third harbor tunnel has been a Council priority for at least a decade. We understand that Mr. Salvucci and his staff have devised a creative, new possibility labelled the seaport access route which generally has met with considerable positive support from our members who are knowledgeable of the scheme. We like positive solutions; we respect Fred's creativeness, and, therefore, lend our support again to making the third harbor crossing a priority with strong emphasis on working the bugs out of the seaport access route and making it the preferred technique.

Solving the Central Artery problem makes infinitely good economic development sense, especially if you pull a Houdini, make it happen instantly and not have to live with the six- to eight-year traffic nightmare that doing it will result in.

As a South Shore resident who commutes to Boston on the Southeast Expressway each morning, I am one of the 100,000 experts available to discuss traffic nightmares.

The Central Artery proposals seem to raise questions about whether the cure is worse than the disease. The Central Artery clearly is to Boston what the main artery is to one's body. Restricting its flow over a long period of time, could end up killing what is otherwise a reasonably healthy person.

The business community, through local organizations that have looked at the proposed courses of action, have raised a number of very legitimate concerns that simply need to be dealt with. The economic viability of the New England region could be severely impacted depending on how this piece of micro surgery is performed. There are many factors that contribute to our region's current economic revival, access to Logan, and the ability to get in and out of New England's major city continue reasonably high on that list.

There is no doubt in our minds that a third harbor crossing will contribute significantly to continued and expanded regional prosperity and should be pursued aggressively and done forthwith.

There is little doubt that dealing with the Central Artery problem should also be a top priority, and a coordinated solution to both problems is highly desirable.

The ways and means of accomplishing a coordinated solution without seriously disrupting the region's economy is unclear enough to knowledgeable observers so that we believe considerable discussion and negotiation needs to take place before we decide to leap in with both feet.

In summary, The Council believes we should go and go slow.

Go right away on the third harbor crossing, and proceed as quickly as possible on the Central Artery solution recognizing that legitimate concerns of local business leaders must be satisfied.



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BOSTON, MASSACHUSETTS 02210
(617) 452-4729

COMMENTS OF THE DRAFT EIS/EIR FOR THE PROPOSED THIRD HARBOR TUNNEL,
INTERSTATE 90/CENTRAL ARTERY, INTERSTATE 93 BY THE FORT POINT ARTS
COMMUNITY, INC. OF SOUTH BOSTON
PREPARED FOR PUBLIC HEARING ON 8/9/83

I am George Vasquez, President of the Fort Point Arts Community, Inc. of South Boston. Our organization represents over 200 artists with studios in the Fort Point area of South Boston.

We are concerned about the potential impact of the proposed Seaport Access Road and Third Harbor Tunnel alternatives on Fort Point Artists and other business and residential neighborhoods in South Boston.

There are many alternative alignments proposed in the Draft EIS/EIR and each alternative has positive and negative features. I will confine my comments to Alternative 5A and Alternative 5A Modified since they directly impact upon our community.

Before addressing some of our specific issues, I'd like to underscore our support for the general concerns expressed by other South Boston community groups. Such concerns about the negative impact of Alternative 5A and Alternative 5A Modified include:

1. Increased truck and commuter traffic using local streets;
2. Air quality and noise;
3. Construction related disruption;
4. The location of the toll plaza in South Boston;
5. Repairs to the Fourth Street, Broadway and Sumner Street bridges;

We also support the concept of job guarantees for neighborhood residents in South Boston.

Alternatives 5A and 5A Modified would cut through the Fort Point Arts Community neighborhood and impact very directly on a building at 269-259 A Street. This building has recently been purchased by 35 low-and moderate-income artists and will be used as work/live studios. Since these artists will be living as well as working in their studios, EOTC is obligated to treat this building as a "sensitive receptor" for purposes of projecting potential noise and vibration impact and identifying mitigating measures.

The next speaker, David Robinson, President of the 269 A Street Cooperative Corporation, will focus his comments on the specific impacts of Alternative 5A and 5A Modified on his building.

710 711 712 713 714 715 716

Our concerns about the potential impact of these alternatives on the Fort Point area are as follows:

1. Vent Structures. We would like to see evidence that the exhaust from vent buildings will not increase air pollution in the areas adjacent to these facilities. We would like assurances that the community will be involved in the design review of the proposed vent structures (which we understand are about 85 feet in height). The vent structure in Alternative 5A Modified is too close to 269-259 A Street and should be located further to the east.

We would also like to see a cost/benefit analysis of Alternative 5A vs 5A Modified in terms of number and location of vent structures;

2. Pile Driving. Construction-related impacts from pile driving or other significant noise generators should be identified along with methods for minimizing such impact. Construction-related noise and vibration can make life miserable for area artists, especially photographers who use vibration sensitive equipment;

3. Ramps. North-bound Congress Street off ramps shown in Alternative 5A Modified should be kept covered as far to the east as possible;

4. Covered Roadway. We would like to see the number of openings in the cut and cover tunnel to be kept to a minimum;

5. Construction Schedule. Specific construction schedules should be prepared to indicate the duration of disruption caused by construction-related activities.

6. Traffic Studies. Specific traffic projections for local streets in Fort Point (during and after construction) should be prepared;

7. Open Spaces. Land takings should provide opportunities for much needed open space and pedestrian access along the Fort Point Channel;

8. Public Transportation. Many of the Fort Point artists and other residents of South Boston rely on public transportation. We are requesting that rapid transit or express bus service from South Station to the airport be considered as part of the plans;

9. EIS For ART. We are requesting EOTC to determine how it will comply with the state requirement that 1 percent of state construction project budgets be used for artwork. We are requesting a commitment to use local South Boston Artists.

10. Community Participation. We would like to see a commitment to involve neighborhood groups in the design and construction planning process.

Thank you for this opportunity to present our point of view.

717 718 719 720 721 722 723 724 725 726 727 728

RESPONSE TO COMMENTS FROM THE PORT POINT ACTS COMMUNITY, INC. OF SOUTH BOSTON, GEORGE VASQUEZ, PRESIDENT (AUGUST 9, 1983)

710. The Preferred Alternative, which includes a seaport access route, will result in decreased truck and commuter traffic on local streets; see Section 4.2.2 Traffic Volumes.

711. Air quality in South Boston will not be significantly affected by the project, but will improve slightly; see Section 4.7.2 Microscale Analysis. Noise in the residential areas of South Boston will be reduced due to traffic reductions elsewhere in South Boston, noise impacts will not be significant (see Section 4.8.1 Noise).

712. Construction impacts in the South Boston residential area will be minor. Increased congestion in downtown Boston may marginally cause diversions of through traffic into the community; see Section 4.3.3 Preferred Alternative (re neighborhood and community facilities impacts, South Boston).

713. The toll plaza for the Preferred Alternative is located at Commonwealth Plaza, Massport-owned property at Logan Airport, at least 1500 feet from the A Street studio/loft building and 1/2 mile from the residential area of South Boston.

714. The West Fourth Street Bridge will be rebuilt (by Boston and the Commonwealth as a separate project) prior to the construction of the Preferred Alternative. The existing Summer Street bridges are owned by the City of Boston; repairs to these bridges are outside the scope of this EIS. The Herald Street extension will be built while the existing Broadway Bridge is still open; after construction the Broadway Bridge will be dismantled.

715. Over the past five years, various job preference programs have been adopted for public works in the Boston area. Such programs may be possible, and will be investigated for this project.

716. 249 A Street has been evaluated as a sensitive receptor with regard to air quality impacts. Noise impacts have not been calculated with this site as a sensitive receptor; future design work will include the building as a sensitive receptor for both impacts as a result of its change in land use.

717. Section 4.7.5 Effects of Ventilation Building Emissions addresses emissions from the proposed vent structures. As indicated in this section, no problems with respect to one-hour and eight-hour CO concentrations are expected from the ventilation building. A potential NO₂ problem exists with respect to exceeding the State's policy level. This problem can be mitigated, and will be addressed during the design phase. Ongoing public participation in this project will occur through the design phase.

718. As discussed in Section 4.4.4 Joint Development, all interested parties, and particularly local residences, will be invited to participate in future design decisions with respect to ventilation building design, location of open tunnel sections, mitigating measures during construction, and use of land created by (or significantly affected by) the project.

719. Ventilation of tunnel structures is required to safely operate motor vehicles. The final number and location of required ventilation buildings will be determined during the design phase based on additional air quality analysis, engineering evaluation, and public input.

720. Construction methods for the tunnel adjacent to sensitive receptors (e.g. 249 A Street) are shown as slurry wall sections, see Supportive Engineering Report. This construction method will reduce the noise and vibration impacts of construction.

721. The extent of roadway decking is still subject to refinement during the design phase. Public input will be sought during design phase.

722. See response to comment no. 721.

723. Construction schedules cannot be written until final design specifications are available. As soon as this information is available it will be distributed to the public, and comments and discussion can occur about it.

724. Traffic studies indicate that traffic on local streets will be reduced by the project; see Section 4.2.2 Traffic Volumes for a selected listing of roadways analyzed. Additional roadway links (11,000 in total) were included in the traffic forecasting process.

725. The provision of pedestrian access and some open space has been incorporated into the mitigating measures for Port Point Channel; see Section 4.16.2 Aesthetic Impacts and Section 5.2.3 Port Point Channel District for a description of the proposed mitigating measures. The Preferred Alternative creates new opportunities for pedestrian access and water related open space uses.

726. As suggested in this comment, the South Station Transportation Center, in conjunction with this project, will include ramps specifically designed for buses which will provide express service between South Station and Logan Airport. See Section 1.3 MAJOR POLICY ISSUES and Section 4.2.8 Other Transportation Facilities.

727. State requirements provide that 1% of project cost up to a maximum of \$100,000 should be spent for art work. During the design phase, specific attention will be given to the incorporation of art work into project design. Local artists, along with other interested community groups, will be invited to participate in the planning for these project elements.

728. Public participation has played an important role in the planning and design of this project and will continue to be encouraged throughout subsequent design stages. As discussed in the FEIS/FEIS, the DORIS/ALTA, I am firmly committed to continuing an active participation process; see Section 4.4.4 Joint Development.

August 3, 1983

GOOD AFTERNOON. I AM JIM O'LEARY, GENERAL MANAGER OF THE MASSACHUSETTS BAY TRANSPORTATION AUTHORITY.

I AM HERE TO DAY TO OFFER MY SUPPORT FOR SECRETARY SALVUCCI'S PROPOSAL FOR A DEPRESSED CENTRAL ARTERY AND A FOURTH HARBOR TUNNEL. . . . AND I SAY FOURTH HARBOR TUNNEL BECAUSE THE THIRD ONE--THE BLUE LINE-- WAS CONSTRUCTED IN 1903 AND TODAY CARRIES MORE THAN 30,000 PEOPLE DAILY FROM DOWNTOWN TO LOGAN AND POINTS NORTH. IT IS IMPORTANT -- TO KEEP THAT MASS TRANSIT LINK IN VIEW WHEN WE ARE EXAMINING COMPREHENSIVE, REGIONAL TRANSPORTATION PROPOSALS. THE BLUE LINE IS A VITAL PART OF OUR TRANSPORTATION NETWORK, AND WE AT THE MBTA WILL CONTINUE OUR EFFORTS TO SEE THAT THE BLUE LINE, WHICH IS WIDELY RECOGNIZED AS ONE OF THE NATION'S BEST DOWNTOWN-AIRPORT CONNECTIONS,

-2-

REMAINS A VIABLE AND EFFICIENT SERVICE.

SO IN OFFERING MY SUPPORT FOR THE PLAN BEFORE US TODAY, I AM NOT OVERLOOKING THE TREMENDOUS POTENTIAL OF MASS TRANSIT, BUT AM REALLY ADVOCATING A BALANCED TRANSPORTATION SYSTEM THAT SERVES THE DIVERSE NEEDS OF OUR CITY AND REGION. NEITHER MASS TRANSIT NOR THE AUTOMOBILE ALONE CAN MEET THOSE NEEDS EFFECTIVELY. SO WHILE WE REMAIN COMMITTED TO THE BLUE LINE, WE ADMIT THAT IT WAS NOT MEANT TO--NOR CAN IT--BE A REPLACEMENT OF THE DESPERATELY NEEDED INTERSTATE LINK THAT MUST MOVE MILLIONS OF TONS OF FREIGHT AND THOUSANDS OF AUTOMOBILES THROUGH OUR REGION. TO INSURE THAT LOGAN AIRPORT REMAINS THE ECONOMIC THRESHOLD OF NEW ENGLAND, WE NEED TO OFFER A BALANCED TRANSPORTATION SYSTEM. IT'S BECAUSE OUR REGION LACKS THAT BALANCE THAT WE ARE HERE TODAY: AND I FIRMLY BELIEVE THAT A DEPRESSED CENTRAL ARTERY WITH AN ADDITIONAL HARBOR CROSSING IS THE SOLUTION.

AN ADDITIONAL HARBOR CROSSING WOULD COMPLEMENT SUCCESSFUL BLUE LINE SERVICE AND GREATLY ENHANCE THE ACCESSIBILITY OF BOSTON AND LOGAN. BUT IF CARS AND TRUCKS ARE STALLED IN 12-HOUR TRAFFIC JAMS ON THE CENTRAL ARTERY, THE TUNNELS ARE USELESS: WE NEED A NEW CENTRAL ARTERY AT THE SAME TIME.

THE BOSTON TRANSPORTATION PLANNING REVIEW RAISED THIS POSSIBILITY IN 1972, WHEN IT RECOMMENDED IMPROVED PUBLIC TRANSPORTATION AS THE PRIMARY SOLUTION TO GROWING REGIONAL TRANSPORTATION NEEDS. THE

MBTA HAS FOLLOWED THAT MANDATE:

- RED LINE EXTENSIONS TO BRAINTREE AND ALEWIFE.
- PURCHASE AND UPGRADE OF 250-MILE COMMUTER RAIL NETWORK.
- EXTENSIVE MODERNIZATION OF TRANSIT STATIONS, POWER AND REPAIR FACILITIES.
- REPLACEMENT AND MODERNIZATION OF ROLLING STOCK.
- SOUTHWEST CORRIDOR/ORANGE LINE RELOCATION PROJECT WITH 8 NEW STATIONS FOR RAPID TRANSIT, COMMUTER RAIL, AND AMTRAK.

MOREOVER, OUR EFFORTS TO IMPROVE TRANSIT WERE DESIGNED TO COMPLEMENT THE REGION'S HIGHWAY SYSTEM, WITH PARKING FACILITIES

CONSTRUCTED SINCE THEN FOR:

- 2,000 AT ALEWIFE
- 700 AT QUINCY CENTER
- 2,000 AT QUINCY ADAMS
- 1,775 AT BRAINTREE
- 550 AT WOLLASTON
- 990 AT NORTH QUINCY.

AGAIN, WE MUST MOVE FORWARD WITH A BALANCED PLAN, THIS TIME GIVING OUR ATTENTION TO DESPERATELY-NEEDED ROADWAY IMPROVEMENTS. MASS TRANSPORTATION CANNOT SATISFACTORILY ADDRESS ALL THE SHORT-COMINGS OF OUR PRESENT ROAD SYSTEM IN THE GREATER BOSTON AREA.

I AM CONFIDENT, NOT ONLY THAT THIS AMBITIOUS PROPOSAL WILL SOLVE THE SERIOUS TRANSPORTATION PROBLEM CONFRONTING US, BUT ALSO THAT ITS POSITIVE IMPACTS ON SURROUNDING NEIGHBORHOODS WILL FAR OUTWEIGH ANY INCONVENIENCES EXPERIENCED DURING THE CONSTRUCTION OF A NEW ARTERY AND TUNNEL.

ON THIS POINT, HIGHWAY PLANNERS CAN LEARN SOMETHING FROM THE

MBTA, WHICH IS NEARING THE COMPLETION POINT OF TWO MASSIVE CONSTRUCTION PROJECTS, THE RED LINE NORTHWEST EXTENSION AND THE SOUTHWEST CORRIDOR/ORANGE LINE RELOCATION.

- RED LINE \$600 MILLION
- ONE OF MOST TECHNICALLY DIFFICULT CONSTRUCTION JOBS IN THE UNITED STATES.
- 3.2-MILE TWIN TUNNELS BORED UNDER CONGESTED HARVARD, DAVIS, AND PORTER SQUARES; WHILE LIFE ABOVE GROUND CONTINUED.
- EXTENSIVE COMMUNITY OUTREACH--WITH NEWSLETTERS, COMMUNITY MEETINGS, AND COUNTLESS HEARINGS--KEPT COMMUNITIES INVOLVED, MINIMIZED DISRUPTION.

- ORANGE LINE \$292 MILLION
- LARGEST CONSTRUCTION JOB IN BOSTON'S HISTORY.
- MAJOR RAIL CORRIDOR FOR RAPID TRANSIT, COMMUTER RAIL, AND AMTRAK BUILT WITH COOPERATION OF SOUTH END RESIDENTS; MASSIVE COMMUNITY OUTREACH EFFORT.
- CONSTRUCTION WENT SMOOTHLY EVEN AT COPLEY PLACE SITE, WHEN THE TWO PROJECTS CONTINUED WITHIN YARDS OF EACH OTHER.
- COMMUTER RAIL SERVICE CONTINUED DESPITE CONSTRUCTION.

SECRETARY SALVUCCI'S PROPOSAL CAN WORK TO BENEFIT BOSTON'S NEIGHBORHOODS WITH A SIMILAR COMMUNITY OUTREACH EFFORT.

I HOPE BY NOW THAT IT DOES NOT SEEM INCONGRUOUS FOR THE MBTA TO BE REPRESENTED AT TODAY'S HEARING. WE REALIZE WE ARE ONE PART OF A DIVERSE TRANSPORTATION NETWORK THAT SERVES MANY NEEDS. JUST AS WE HAVE RELIED ON HIGHWAY USERS TO SUPPORT OUR PROJECTS, WE FEEL COMFORTABLE RETURNING THAT SUPPORT . . . BECAUSE WE APPRECIATE THE IMPORTANCE OF AN EFFECTIVE, BALANCED TRANSPORTATION NETWORK.

THIS ARTERY/TUNNEL PLAN WILL BRING US ONE STEP CLOSER TO ESTABLISHING SUCH A NETWORK.

THANK YOU.

RESPONSE TO COMMENTS BY MBTA GENERAL MANAGER JAMES F. O'LEARY

No response necessary.

729

Standex International Corporation owns property at 335 "B" Street Extension in South Boston on which it conducts operations through its Harding Company Division. The Harding Company is New England's largest supplier of hoisting and rigging equipment. It manufactures wire rope slings and assemblies, chain assemblies, nylon slings and other hoisting and rigging equipment and supplies for this area.

A substantial portion of the business of Harding involves the immediate repair or replacement of slings, chains or other equipment. The Company is continually receiving requests from companies such as New England Telephone and other large users of our equipment for an immediate turn-around on repair or replacement. In this time-critical business, a central location is essential.

We wish to go on record as being vehemently opposed to Alternative 5A which would include a third harbor tunnel to the airport through so-called "Commonwealth Plots". This proposal appears to run right through the center of our property and would necessitate relocation of the Harding Company.

Based upon the fact that a relocation would probably mean a less accessible site for Harding which would result in a decrease in the "off-the-street" business, we wish to voice our objection to Alternative 5A and ask that your consideration of this objection be placed in the record and taken into account when a final decision is made.

730

RESPONSE TO COMMENTS BY STANDEX INTERNATIONAL CORPORATION

729. Section 4.3 RELOCATION IMPACTS identifies Standex International as a business displacement. As indicated in that section of the FEIS/FEIR, comparable relocation space appears to be available in the area. Standex will be eligible for relocation assistance, also as indicated in that section.

730. See response to comment no. 729. The Commonwealth will work with displaced businesses to minimize inconveniences and impacts caused by the project.

CHAS. DI MATTEO

LANDLORD: 40-44 CROSS ST., BOSTON

1. Will my real estate on Cross St. between
Esplanade St. & Salem St. be taken by
eminent domain?
2. Will any of my tenants still be able to
continue to unload their merchandise
in front of their places of business?
3. If in any event my tenants cannot
continue their business as usual and
they must vacate the premises, how
are they to be compensated by the loss
of income? Will they be able to
continue their business?

Charles Di Matteo

My business
237 Cross St. Bldg
Boston, MA 02115

RESPONSE TO COMMENTS FROM CHARLES J. DI MATTEO, LANDLORD, 40-44 CROSS ST.,
BOSTON (August, 1983)

731. This property will not be taken; no real estate will be taken on Cross Street. Tenants referred to in this letter will be able to continue to unload their merchandise in front of their places of business. Access for delivery trucks will be maintained throughout construction.

The potential loss of business due to construction period disruption is a matter of great concern to North End residents, merchants, and the Commonwealth. Mitigation measures will be further addressed as construction techniques are more fully developed. In keeping with this concern, the Commonwealth has made specific commitments to provide needed replacement parking before construction begins, will ban all heavy construction trucks from North End streets, and will support the community's right to active participation in the process of planning for the use of new parcels created along the depressed Artery. The Commonwealth is also examining other ways to assist businesses affected by construction period disruption potentially leading to a loss in revenue: the Commonwealth wants to assure their continued operation in the neighborhood through the construction period.

6 August 1983

To: Secretary Fred Salvucci

Re: hearing on depressing the Central Artery and/or construction of a 3rd harbor tunnel
From: Caroline Stouffer, Chairman, Town of Hingham Transportation Committee

While I would have much preferred to attend the Faneuil Hall hearing, personal matters made it necessary for me to be out of state and I am unable to be there in person.

What I have to say, however, is brief and so can be, I'm sure, presented to you in the form of this memo.

- 1) The Committee which I chair strongly agrees that action correcting the present situation regarding the Central Artery is urgent. We too can foresee only larger and longer traffic snarls if it is not widened and if other improvements are not implemented as soon as possible.
- 2) Depressing the Central Artery seems the most urgent and beneficial choice, allowing side benefits such as creation of open space, air rights and the possibility of commercial development atop the Artery, general improvement in the entire surroundings of the waterfront properties, etc.
- 3) There is no reason to believe a 3rd harbor tunnel will do much to alleviate the traffic congestion on the Central Artery. Unless the Artery is the first priority, we would consider the tunnel to be of substantially less importance.
- 4) The route of any depressed Artery cum tunnel must be chosen to cause the least possible disruption of businesses, travellers and neighborhoods. Depressing the Artery would allow traffic to flow while construction is underway. Problems of disruption to North End businesses has been addressed in the DEIS, and we are convinced the Secretary will do his best to minimize those disruptions wherever possible.
- 5) The route of any tunnel must also disrupt as few residences and businesses as possible. To that end, it seems as if the choice of route terminating (emerging) at the Bird Island Flats is the best one.
- 6) The "no build" and "tunnel only" options should both be rejected. Neither one addresses the total range of questions and neither presents the lasting solutions and additional benefits to travellers or the city and its residents and businesses directly affected (or indirectly affected by economic improvements) as the choices involving depressing the Central Artery.
- 7) Depending on what funds are available, the best option seems one which includes both depressing the Artery AND building a 3rd harbor tunnel; but if a choice has to be made, then it should be to depress the Artery and widen it, and let the tunnel go.

8) Additionally, it should be pointed out that solutions such as ferries from the waterfront area across to E. Boston and the Airport are not "pie in the sky" ideas. What has been a "pie in the sky" idea could also be done in Boston. What transit system across the water from Boston to the Airport? What transit system from the Airport to the waterfront?

732

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for the project, sufficient area along the car route could be prepared so that at some future date (if not feasible at the same time as Artery construction), a shuttle train system, similar to the Grand Central Station to Times Square, might be installed. It would seem an ideal time to include this component in your planning, as there may never again come a chance to do it for such a (relatively) low additional cost.

RESPONSE TO COMMENTS FROM CAROLINE STOUFFER, CHAIRMAN, TOWN OF HINGHAM
TRANSPORTATION COMMITTEE (August 6, 1983)

732. Ferry Service was examined during the draft stages of this study and it was determined that such service did not provide the necessary transportation improvements; see Section 2.3.5 Pre-EIS Studies. Ferry service is not precluded by this project.

733. The Central Artery corridor is very tightly constrained by the dense development on either side. It would not be possible to construct a rail line alongside the tunnel in this narrow right-of-way without resulting in residential displacements and additional businesses displacements. The Preferred Alternative includes direct bus ramps linking the South Station Transportation Center with the Seaport Access Alignment Tunnel (to Logan) and with the Southeast Expressway. As indicated in Section 1.3 and Section 4.2.8, the Preferred Alternative will have an insignificant impact on transit ridership in the region.

The Boston Preservation Alliance

An Association of Preservation Organizations

P.O. Box 1185, Boston, Massachusetts 02103

Phone: 617-242-5656

August 9, 1983

Mr. James A. Walsh
Division Administrator
Federal Highway Administration
Transportation Systems Center
55 Broadway, 10th Floor
Cambridge, MA 02142

Dear Mr. Walsh:

The Boston Preservation Alliance welcomes the opportunity to comment on the Environmental Impact statement and its supplement for the Third Harbor Tunnel, Interstate 90/Central Artery, Interstate 93. As a coalition of thirty-one preservation groups and historical societies in the City of Boston, the Alliance has deep concern for issues such as this that affect the built environment and the well being of Boston's citizens. The Alliance appreciates the scope of this project whose objective will undoubtedly result in better transportation for the city and the region.

However, the Alliance opposes certain aspects of this project which will have a negative impact on historic resources in the central city and beyond. The first of these is the way in which the Fort Point Channel will be affected. A historic study of water (and potentially eligible for the National Register of Historic Places) the Fort Point Channel is the last remaining body of water that defines the old Shawmut Peninsula. The Channel will be severely compromised unless modifications to this project are made. The only alternative that the Preservation Alliance would support with modifications would be number 5A. The other alternatives diminish the Channel drastically because of the introduction of ramps and roadways on the surface. The Alliance opposes the extent to which the bulkhead of the new Dorchester Avenue projects into the Channel under alternate 3A and feels that the bulkhead should be diminished to the minimum. The Alliance would also like to see the roadways at the head of the Channel made entirely inconspicuous. Associated with this project is the building of a fixed span bridge to replace the current Northern Avenue bridge. The highway of this bridge will be too low to allow sailboats to pass through. The Alliance believes that this will have a negative impact on the Channel as a recreational facility.

Second, the Alliance is concerned about the traffic impact of the project on the South End during and after construction. The Alliance believes that Herald Street should be widened in order to help accommodate the huge flow of vehicles reduced to pass through this National Register district, which is also the largest Victorian residential neighborhood in this country.

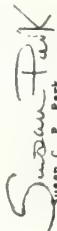
Letter to Mr. Walsh
Page 2

The Alliance is concerned about certain impacts of the proposed depression of the Central Artery. They are as follows:

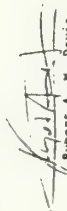
- a) the effect on adjacent historic buildings and areas (such as the North End) during and after construction,
- b) the placement of vents and any other structures associated with depression,
- c) the disposition of the surface area left after the project is completed.

The Alliance feels that a feasible answer must be formulated to address these concerns and that a proper review process (such as the IOK review) should be applied with full rigor. Again, the Alliance is thankful for the opportunity to comment on this project.

Sincerely,


Susan C. P. Park
Chairman

cc: Mr. Robert J. McDonagh, Mass. Dept. of Public Works
Mr. James Hyatt, Secretary of Environmental Affairs
Ms. Marcia Myers, Boston Landmarks Commission
Ms. Valerie Talavage, Massachusetts Historical Commission
Mr. Frederick Salvucci, Secretary of Transportation
The Honorable Michael S. Dukakis, Governor
Mr. John Vitagliano, Traffic Commissioner, City of Boston
Mr. Robert Ryan, Boston Redevelopment Authority


Robert A. M. Davis
Executive Director

RESPONSE TO COMMENTS BY THE BOSTON PRESERVATION ALLIANCE (August 9, 1983)

See responses to comments by the Boston Preservation Alliance, numbered 614-620.

East Boston Fair Share

***758 Saratoga Street, East Boston, MA 02128
Phone: 569-8930, 288-7400***

FRWA
Mr. James A. Walsh
Division Administrator

August 8, 1983

and

MDPW
Mr. Robert J. McDonagh, P.E.
Chief Engineer

Re: Third Harbor Tunnel, Interstate 90/Central Artery;
Interstate 91, Boston, Massachusetts
Comments on MPEA-EDEA No. 4325

Dear Sirs,

After reviewing the DEIS/DEIR and the SDEIS/SDEIR we have prepared the following comment for your review according to the Massachusetts Environmental Policy Act (MPEA) EDEA No. 4325 and hereby submit them for consideration and response.

Our position is also that of the Coalition Against a Third Tunnel and we will not at this time reiterate those concerns. However, two issues have come up of late which warrant further investigation. As the Administration is lobbying for the support of the business and labor communities, the position has been taken that the Third Harbor Tunnel, Interstate 90 project is inseparable from the Central Artery, Interstate 91 project. It is our understanding that the Third Harbor Tunnel EIS/EA faced a September 30 completion deadline. It is also our understanding that the repair or reconstruction of the existing Artery has no timeline and may require further review and study. We would appreciate a clear position from the Federal Highway Administration on the connection between funding for the Central Artery project and the proposed Third Harbor Tunnel.

We are also distressed that the public hearings on the Draft Environmental Impact Statement/Report for a Depressed and Widened Central Artery/Third Harbor Tunnel Project are being held in Faneuil Hall. Faneuil Hall is completely without handicapped accessibility, this gross discrimination against disabled people is unwarranted. It prevents a section of Boston's population who will be greatly impacted by the adverse effects on public transportation, with a decline in ridership and subsequent decline in revenue, from reviewing materials and information about the proposed projects.

We hope these comments will be considered and acted upon as deemed necessary. A third harbor tunnel not only adversely affects East Boston but all of Boston's working class neighborhoods. The needs for a balanced transportation system that moves people and goods cries louder and louder, but such a system must focus on also reducing the volume of traffic.

For a Fair Share,

Angela Bolognese
President

RESPONSE TO COMMENTS BY EAST BOSTON FAIR SHARE (August 8, 1983)

See responses to comments by East Boston Fair Share, numbered 557-559.

ARTHUR KENNEDY, V.P. Technical Services
MILAND G. OWEN, V.P. Engineering
MATTHEW S. STURM, Managing Editor, 1980
MICHAEL C. JACUWAY, Managing Editor, Sunday
ANDREW HEAT, Assistant Editor
ROBERT W. PHELPS, Assistant Editor

ANNUAL
PRESIDENT
WILLIAM C. TAYLOR, 1977-1982
VIRGINIA D. TAYLOR, 1983-1987
JOHN L. TAYLOR, 1983-1985

The artery and the tunnel

A uniquely attractive element to the community of the city of Boston is the new tunnel to Logan Airport with a new tunnel and opening Boston Harbor with a new tunnel. The package, emerging in detail from a combination of planning, design, public comment and political realities, deserves the full support of local leaders and the federal agencies in whose hands its final fate lies.

It is in combination that the two projects—tunnel and highway—make the most sense. By 1990, after a delay of 19 minutes between Southampton street and Charlestown to west, a third tunnel drops the wait merely to 18.7 minutes, while building the tunnel and depressing the artery cuts the wait to six minutes.

A series of federal interstate highway program dead-end lines has forced all parties to consider a new, achievable plan. East Boston opportunities to carter tunnel proposals have been largely won over by several factors: the tunnel as now envisioned will



ROUTE MAP OF TUNNEL LOCATION

While initial plans appeared to sacrifice the arterial highway, the tunnel design—aided in no small part by Robert Priestley—preserves the channel and artery, and will actually increase pedestrian access to the channel's edge. Its 19th century architecture and its charming bridges.

Most important, the package deals directly with the worst single traffic problem facing the city: congestion on the Central Artery. By depressing and widening the artery, and relocating portions of it along Fort Point Channel, the proposal addresses future traffic growth through a plan that minimizes congestion during periods of construction.

The key to reduced congestion during construction is the ability to build the new artery while keeping the present, elevated artery in full operation except for relatively brief periods during construction of the new portion. This contrasts conspicuously with proposals for simple resurfacing of the artery, which would involve long-term closing of traffic lanes on a facility that is already inadequate for handling the volume of traffic imposed on it.

Depression, moreover, creates 20 acres of new land atop the depressed artery—a startlingly attractive development opportunity because the present land downtown is so tight.

The new plan will surely produce specific criticisms. It has been pointed out, for instance, to link the northbound artery with the expanded Dorchester avenue through a surface link and traffic light rather than an underpass. The queuing space for exiting traffic is painfully short, and state management of traffic lights has been too inept to allow any confidence that this scheme will do anything but back traffic up onto the expanded expressway.

CENTRAL ARTERY/TWIRD HARBOR TUNNEL

I wish to express my respect of
 alternative 3A. I believe this will have the
 least adverse effect on neighborhoods. It will
 allocate traffic to the highest B+ B-
 category growth corridor. Because of the
 nature will be able to handle traffic more
 adequately, it will not be acceptable to
 the author. Therefore, I am expressing a little
 misgiving. Now, with the the proposed strategy
 will provide much needed expansion. In the
 east and west end my blackheads, when
 I will be able to contribute to the pair. For
 much would have in the future will be
 the I believe this city should be a negative
 will be a place where the future will be
 the I will be able to contribute to the future
 of the city. I believe the future will be

Creation: 10/20/2000

31.

734. The Preferred Alternative (5A Modified) provides many of the same benefits as Alternative 3A: reduced congestion to the Airport and on the Central Artery; open space and air rights development potential in downtown Boston; and employment and tax revenue increases. While their effects on neighborhoods are comparable, the Preferred Alternative has less adverse effects on the Fort Point Channel than does Alternative 3A. The Preferred Alternative provides additional benefits, in the form of an interstate-scale Seaport Access route which will support economic development in the South Boston waterfront. The cross-harbor tunnel to the Airport also has additional benefits than the tunnel of Alternative 3A, including: avoiding Jeffries Cove and Bird Island Flats Park in East Boston; requiring significantly less dredging; and significantly less impacts to East Boston Memorial Stadium. See Section 2.4 REASONS FOR NOT SELECTING OTHER EIS ALTERNATIVES.

CENTRAL ARTERY/THIRD HARBOR TUNNEL

The citizens of West Highland
heartily affirm the proposition and
will ensure the Central Station and
the construction of a third Harbor
Tunnel.

We must have both of these
important projects completed as soon
as possible and the General Board
should act with speed — for this
most important place for the future

August 8, 1983

1375. *Spiraea* 54.

W. Audscent 02370

RESPONSE TO COMMENTS BY RAYMOND E. CHACE (August 8, 1983)

No response necessary.

CENTRAL APTERY/THIRD HARBOR TUNNEL

CORRIDOR PUBLIC HEARING

CENTRAL APTERY/THIRD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

1. The first part of the paper is devoted to a general discussion of the problem of the existence of a solution of the system of equations (1) for arbitrary values of the parameters α and β . It is shown that the system has a solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

2. In the second part of the paper the problem of the uniqueness of the solution of the system of equations (1) is considered. It is shown that the system has a unique solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

3. In the third part of the paper the problem of the stability of the solution of the system of equations (1) is considered. It is shown that the system has a stable solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

4. In the fourth part of the paper the problem of the asymptotic behavior of the solution of the system of equations (1) is considered. It is shown that the system has an asymptotically stable solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

5. In the fifth part of the paper the problem of the periodicity of the solution of the system of equations (1) is considered. It is shown that the system has a periodic solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

6. In the sixth part of the paper the problem of the boundedness of the solution of the system of equations (1) is considered. It is shown that the system has a bounded solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

7. In the seventh part of the paper the problem of the convergence of the solution of the system of equations (1) is considered. It is shown that the system has a convergent solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

8. In the eighth part of the paper the problem of the divergence of the solution of the system of equations (1) is considered. It is shown that the system has a divergent solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

9. In the ninth part of the paper the problem of the oscillation of the solution of the system of equations (1) is considered. It is shown that the system has an oscillatory solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

10. In the tenth part of the paper the problem of the nonoscillation of the solution of the system of equations (1) is considered. It is shown that the system has a nonoscillatory solution for arbitrary values of the parameters α and β if and only if the condition $\alpha + \beta = 1$ is satisfied.

Submitted by

Line

Declaration

Address _____

Date _____

RESPONSE TO COMMENTS BY JOSEPH JOYCE (No Date)

No response necessary.

COMPOUND FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/THIRD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

A land believe better can meet 10 years for the state to solve the present flood problem. I would like to suggest instead of a tunnel to the airport, I believe a bridge would be prior to build.

Leading ^{the} way from the Expressway and near the water road to Long Island and from the north from the airport and 84th Ave over the water and way to Deer Island. A body of high enough water the lander shipping channel would complete the link.

The other system is my 8th design. The transportation of the Expressway across the water.

Submitted by

100

100

RESPONSE TO COMMENTS FROM JOSEPH F. FALCONE OF 291 CENTRE ST., DORCHESTER

735. The Boston Transportation Planning Review (BTPR) considered connecting Boston Harbor islands in an Outer Harbor Crossings concept using a combination of bridges and surface facilities. This concept was rejected for several reasons: clearance requirements of a bridge over the major shipping channel would create a hazard for Logan Airport flight clearances; connections to other regional facilities would not be feasible; downtown collection and distribution requirements would not be fulfilled (see Section 2.3).

CONSENT FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/THIRD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

Comments:

I am in favor of the project. It will provide a much needed link between the city and the harbor. The project is well planned and the cost is reasonable. I hope the project will be completed as soon as possible.

Submitted by

Name

Organization

Address

Date

RESPONSE TO COMMENTS BY JOHN KREANLAND (No Date)

No response necessary.

CONSENT FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/THIRD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

I have been a resident of Boston since 1975 and have been employed in the central business district since 1981. It is my opinion that the completion of the combined tunnel/artery project is in the best interest of Boston and the Commonwealth. Alternative 5A, modified, appears to offer both the greatest transportation advantages and fewest adverse environmental impacts. The cost differential between this alternative and any of the less expensive alternatives is justified by its manifestly superior benefits.

It is necessary at this time, however, that the DPW commit itself to full pedestrian access along the western edge of Port Point Channel from Northern Ave. to the Broadway St. MBTA station. Such a waterside promenade has been shown on some, but not all drawings. Some drawings have shown only a through sidewalk between a "rebuilt Dorchester Ave." and the Postal Service truck loading apron. This would not be acceptable.

On the whole, the plans are outstanding.

Submitted by

Name

Organization

Address

RESPONSE TO COMMENTS FROM BILL KUTTNER OF 199 MASSACHUSETTS AVENUE #210, BOSTON, (August 9, 1983)

736. Alternative 5A Modified, now the Preferred Alternative, will include pedestrian access along the western edge of the Port Point Channel, from a point slightly to the south of Northern Avenue to the MBTA Broadway Station. See Section 4.16 AESTHETIC IMPACTS and 5.2.3 Port Point Channel District.

COMMENT FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/THIRD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

It would like to be reconsidered as far as it is possible to express and the final final location of the project in 1980 because there are the state of which money line in the East Boston children Boston area are also in front of the project

Submitted by Charles DeFosa DeFosa Developmental

Name

Line of occupation

Organization

Address

120 N. 14th St.

Date

Resubmitable

RESPONSE TO COMMENTS BY CHARLES DeFOSA (No Date)

No response necessary.

COMMENT FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/THIRD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

I am not a native of Boston but was born and lived in Rossmore and always knew that a great tunnel in Boston I must have had a tunnel is needed and something close to the Central Artery. Boston traffic would not be what it is if people coming from the north the sea and the south to the north would have the city. The Inner Belt of the South West Boston was built by the state. I was a member of the state of good citizens. I would not like to have a tunnel in Boston because the city is not a tunnel. I would like to have a tunnel in the city.

Submitted by

Name

RESPONSE TO COMMENTS OF WALTER J. LISTON OF OSTERVILLE, MASSACHUSETTS (August, 1983)

737. The Inner Belt Concept was rejected in 1971 due to the major disruptions to communities and neighborhoods along the proposed corridor, including extensive residential takings in some neighborhoods (see Section 2.3).

COMMENT FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/THIRD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

I would like to see a sign on the road as being in favor of the construction of a 3rd Harbor and suppression of the Central Artery

Submitted by

Name

Richard V. G. - Independent

Organization

NORFOLK CENTRAL LABOR COUNCIL

Address

450 GUNNY AVE

Date

GUNNY MASS 02167

RESPONSE TO COMMENTS BY NORFOLK CENTRAL LABOR COUNCIL (No Date)

No response necessary.

COMMENT FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/THIRD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

I would like to see a sign on the road as being in favor of the construction of a 3rd Harbor and suppression of the Central Artery

Submitted by

Name

James A. Damery

Organization

PAINTERS DISTRICT COUNCIL

Address

16.35 303 FREDERICKS

Date

Oct. 1955

8-8-83

RESPONSE TO COMMENTS BY JAMES A. DAMERY (August 8, 1983)

No response necessary.

CONSENT FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/TRIPOD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

WHAT HAPPENS TO THE INCREASED TRAFFIC AFTER IT LEAVES THE THE AIRPORT HEADED NORTH ON CI.

MY CONCERN IS THAT 20,000 CARS PER DAY INCREASE WILL REQUIRE A CHANGE IN ROADWAY BETWEEN NEPTUNE ROAD AND BELL CIRCLE

Submitted by

MARTIN FORGIONE

Name

RESPONSE TO COMMENTS OF MARTIN FORGIONE OF 406 FRANKFORT STREET, EAST BOSTON, [August, 1983]

739. Traffic on CI (Route 1A) will increase as a result of this project, but levels of service will still be acceptable. See Section 4.2.2 Traffic Volumes.

As indicated in responses to other comments, as well as in the FEIS/FEIR, increasing the capacity of Route 1A and/or construction of Interstate Route 95 through this area are not proposed by the Commonwealth. Increasing the capacity of these roadways (particularly Bell Circle) would result in significant increases in traffic being attracted to this facility which is counter to the policies of the Commonwealth (see Section 1.3 MAJOR POLICY ISSUES).

CONSENT FORM

CORRIDOR PUBLIC HEARING

CENTRAL ARTERY/TRIPOD HARBOR TUNNEL

If you wish, please use this form to record your comments. If you leave it at the sign-in table, it will be delivered to the Massachusetts Department of Public Works.

I believe it's a mistake to build yet another tunnel to the airport. It is pretty much to close the Spickett Tunnel, which have diverted bus traffic so severely? I don't know.

I believe every dollar spent on developing transportation along the harbor - service - instead of building a new waterway - service like Venice, which is a special charm, making transportation a pleasure instead a nightmare. The Subway System there also be improved & made into an attraction, like the old S.C.C.

The 3rd tunnel is only for bus - transportation. I don't see how it will help. I don't see how it will help. I don't see how it will help. I don't see how it will help.

Submitted by

Name

RESPONSE TO COMMENTS OF NINA MYER OF 3 UNITY STREET, BOSTON (August 9, 1983)

740. The large volume of cross harbor trips makes the closing of the existing tunnels infeasible as a traffic management measure.

741. The benefits of a ferry service were examined during the draft stages of this FIS process and it was determined that ferry service alone would not provide the necessary traffic improvements; see 2.3.5 Pre-FIS Studies. Ferry service is not precluded by this project.

742. Additional evaluation of impacts and the exploration of ways to mitigate these impacts will continue throughout the subsequent phases of this project.

RESPONSE TO COMMENTS FROM WILLIAM L. SIMPSON OF 129 WEST BROADWAY, SOUTH
BOSTON (August 9, 1983)

743. A similar alignment through this railroad right-of-way was examined and rejected in an earlier study, the Seaport Access System Study prepared by the Boston Redevelopment Authority and the Massachusetts Port Authority.

After careful study of the proposed Seaport Access alignment, it has been concluded that the design concepts in the Preferred Alternative will be considerably more effective than the BMA/Massport proposal, particularly because of its interchange with the Southeast Expressway and the Massachusetts Turnpike. The Preferred Alternative provides an interstate-quality facility to this area as opposed to the small-scale Seaport Connector proposed in the BMA/Massport proposal.

SUGGESTION:

AUG 9 1983
THE FREIGHT LINE RAIL-
ROAD TRACKS GOING THRU SOUTH BOSTON
ARE LITTLE USED. TWO TRACKS OR (743)
FOUR ARE NOT USED AT ALL.

ALONG WITH THE NEW THIRD HARBOR
TUNNEL WHY NOT PAVE OVER THE
SECOND AND FOURTH RAILBEDS AND HAVE
DIRECT ACCESS FROM FRONTAGE ROAD
ADJACENT TO THE S.E. EXPRESSWAY
RIGHT TO NORTHERN AVENUE?

I AM OPPOSED TO DEPRESSURE THE
CERIAL
AREARY AS WASTEFUL AND NOT
NECESSARY.

William L. Simpson
129 West Broadway
South Boston
MA 02127

Testimony on the Third Harbor Tunnel and Central Artery

Lawrence S. DiCara August 8, 1983

Good evening. I appreciate the opportunity to comment on an issue that is crucial to the future not only of Boston, but also of the New England region as a whole.

The fate of the Central Artery and the question of whether we build a Third Harbor Tunnel have been under study for over a decade. New Transportation Secretary Salvucci has released the Environmental Impact Study report on the alternatives. After reviewing the EIS, as well as studies of Boston's economy prepared by the Boston Redevelopment Authority, I want to go on record in support of widening and depressing the Central Artery, and constructing a Third Harbor Tunnel. I believe a joint project is the only practical solution and I favor Alternative 5A modified.

Before getting into detail as to why I favor this particular alternative, I would like to speak in general about the value of this admittedly awesome transportation project. Boston is now enjoying a boom period—two decades of growth and development following over 20 years of depression from 1929 to the early 1960s. The fact that Boston's revival began that we now are flourishing is due to New York, Chicago, and San Francisco—in downtown areas—in retail, hotel, and cultural facilities, as well as in housing development and employment concentration. Between 1968 and 1982, private development investment was \$6.8 billion, and another \$3 billion is expected to be completed by 1986. Boston has gained a net of 46,000 new jobs since 1976.

I believe we are now at a turning point in the city's history. We can either ride the coat-tails of the economic growth we have recently achieved—and the projections for the near term are bright—or, we can make a bold decision to plan for the economic growth of the city and the New England region into the 21st century. Do we see ourselves as a charming, provincial city currently enjoying better times? Or, can we accept Boston as one of the most dynamic cities in the nation, with interdependent links to the surrounding metropolitan area and the New England region beyond?

To me, the answer is obvious. Given the economic links between Boston and the surrounding area, and given the industries that are experiencing growth—service industries and high tech products—vehicular access is crucial to realizing the potential of the future.

Our recent surge of economic growth has put enormous pressure on our existing transportation resources. When the Central Artery was built during the 1920's, Boston was emerging from depression. Today, an average 150,000 cars use it each weekday. We are all familiar with the rush hour traffic jams,

According to the BPA, Boston is projected to gain 93,000 jobs in the next decade alone. By 2010 the EIS forecasts all-day traffic jams on the Artery if capacity isn't increased.

Similar growth has been experienced at Logan Airport. Boston is a major national and international air terminal served by 34 air lines. The number of air travel passengers arriving and departing from Logan increased at an annual rate of five percent between 1970 and 1980. The value of air freight shipped overseas from the Boston Customs Region grew by over 800 percent in the last ten years. Logan is also important to the movement of the region's products destined for domestic markets. According to the EIS, an estimated 51 percent of the value of domestic air freight movements from Boston is generated by two industry groups—machinery, and electric machinery and equipment—which require same day or next day service. They are clearly dependent on timely access to Logan and since these two industry groups now account for one-third of regional and statewide manufacturing employment, it is clearly in the city's interest that access be timely.

I believe that these growth statistics indicate the need for both the Third Harbor Tunnel and the widened, depressed Central Artery, but let me briefly consider the alternatives.

If we simply resurface the Central Artery, we will spend less money. We will have fewer years of construction, and fewer disruption of the surrounding street systems to put up with. However, the flow of expressway traffic will be impeded by closed lanes—it is painful to witness the traffic snarl that rush hour will become—and we will have fewer rights to show for our endurance, effort, and the money we have spent. In addition we will deny the city the opportunity to develop some 20 acres of air rights over the city the opportunity to develop some 20 acres of air rights over the Central Artery. This development would re-join the city, providing a transition between downtown and the waterfront, increase the tax base, and provide thousands of new jobs.

If we build a Third Harbor Tunnel without depressing and widening the Central Artery, we will improve access to Logan, but there will be no relief from North/South congestion. What good does it do to build a Third Harbor Tunnel if nobody can get to it because of bumper-to-bumper traffic on the Artery?

We could widen and depress the Central Artery without building a Third Harbor Tunnel to Logan, but this would ignore our growing dependence on the time-sensitive air freight shipment of high tech products I mentioned earlier. If access to the Airport is not improved, I believe it will be more difficult to attract new companies to the region and existing companies may be discouraged from expanding here.

Although I think the common good is best served by building both the Third Harbor Tunnel and the depressed Central Artery, I am aware that the project will produce some adverse impacts in

No response necessary.

the near term. The EIS states that the build alternative could result in retail sales losses of up to five percent of the area's total retail sales during construction or approximately \$45 million per year. I see this as a problem but not an insurmountable one. It is auto-dependent sales to Downtown Crossing retailers which will be affected. The completion of the Red and Orange Line extensions should help offset this loss. The strength of the downtown retailers and the driving power of Lafayette Place, which will soon open, give me confidence that we can solve temporary access problems. Similarly, access to the North End is likely to be affected by the loss of parking near the Central Artery. However, pedestrian access will be improved when the Central Artery comes down and no longer blocks the North End from downtown.

Of the build alternatives, I favor 5A modified. According to the EIS, it will have the largest impact on the regional economy during construction, generating \$3.5 billion in so-called multiplier effects. It creates the least amount of traffic disruption to East Boston and the North End and will provide the largest savings in travel time. It provides direct access to the planned Seaport development such as BOSCOM along the waterfront, and creates six acres of likely development parcels in South Boston. This alternative takes no homes or businesses in East Boston. Many community leaders long opposed to earlier proposals for a third Harbor Tunnel support it.

The construction cost of alternative 5A Modified is over \$2 billion. One way to put this into perspective is to note that the billion of private development in downtown Boston has cost in the last 20 years have been leveraged by billions of public investment dollars--almost \$2.5 billion between 1960 and the mid-1970's. Since then, there has been a steep decline in public investment due to budget constraints, a more costly bond market, and tax limitation legislation, among other reasons. A recent background study on infrastructure planning prepared by the Boston Redevelopment Authority concluded that private development investment would proceed only for a short period without commensurate public infrastructure back-up. I believe that if we do not update Boston's transportation system we will jeopardize the economic growth of the surrounding New England Region, as well as the economic health of the city.

Securing the funds to build the Joint Tunnel/Artery Project will require extraordinary cooperation between city, state, and federal officials. As a candidate for Mayor of Boston, I pledge my support for the project, and call on others to do the same. Thank you.

94 BYRON STREET
EAST BOSTON,
MASS. 02128
8 AUGUST 1983

GENTLEMEN;

I SUPPORT THE PLANS TO BUILD A NEW
HARBOR TUNNEL AND DEPRESS THE ARTERY.
SECRETARY SALVUCCI HAS DONE A VERY
GOOD JOB.

HOWEVER, THE PROPOSED LEVERETT
CIRCLE OVERPASS SHOULD BE CONSTRUCTED
IN ORDER TO CLEAR UP THE TRAFFIC
MESS THERE. NOTHING COULD BE MORE
ANIMAL THAN LEVERETT CIRCLE AS IT IS
AT PRESENT.

SINCERELY,

Paul W. Manning

(744)

RESPONSE TO COMMENTS BY PAUL W. MANNING (AUGUST 8, 1983)

744. Leverett Circle improvements have been the subject of a number of recent studies which have proposed new Charles River tunnels, overpasses, and other improvements. These improvements were vehemently opposed by residents of the West End and Back Bay, as they would remove the metering function of the existing Circle and attract new traffic. A policy decision was made not to pursue that project further; see Section 2.5 DESIGN CONSIDERATIONS FOR THE PREFERRED ALTERNATIVE for additional information.

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